



Code of Business Standards and Ethics

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

| | |
|--|-----------|
| CODE OF BUSINESS STANDARDS AND ETHICS | 3 |
| 1. About Super Group | 3 |
| 2. Strategic Vision | 4 |
| 3. Our Values | 4 |
| 4. Ethical Standards | 4 |
| 5. Fair and Ethical Decision Making | 5 |
| 6. Protection of Company Property | 7 |
| INTELLECTUAL PROPERTY AND PERSONAL INFORMATION | 7 |
| PROTECTION OF CONFIDENTIAL INFORMATION | 8 |
| COMPANY ASSETS | 8 |
| 7. Labour Standards and Human Rights | 8 |
| DIGNITY, FAIR TREATMENT AND NO HARASSMENT | 9 |
| FORCED LABOUR AND CHILD LABOUR | 9 |
| WORKING HOURS AND LEAVE | 9 |
| WAGES AND BENEFITS | 9 |
| FREEDOM OF ASSOCIATION | 9 |
| ANTI-DISCRIMINATION | 10 |
| THIRD PARTY EMPLOYMENT AGENCIES | 10 |
| FAIR EMPLOYMENT PROCEDURES AND REMEDIES | 10 |
| LAND RIGHTS OF COMMUNITIES | 10 |
| GRIEVANCE SYSTEMS | 11 |
| EMERGENCY PREPAREDNESS AND RESPONSE | 11 |
| INCIDENT MANAGEMENT | 11 |
| WORKING AND LIVING CONDITIONS | 11 |
| 8. Health and Safety | 11 |
| 9. Transformation | 12 |
| 10. Employee Responsibilities | 12 |
| 11. Responsibilities to Sustainability | 13 |
| 12. Supplier's Responsibilities | 15 |
| 13. Non Compliance | 15 |

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

CODE OF BUSINESS STANDARDS AND ETHICS

1. About Super Group

Super Group Limited (Registration Number 1943/016107/06), the holding company of Super Group, is a company listed on the Main Board of the JSE Limited in the “Industrial Transportation” sector, incorporated on 16 June 1943 and domiciled in the Republic of South Africa. Super Group is a leading transport logistics and mobility group, headquartered in South Africa with operations in Africa, Australia, New Zealand and the United Kingdom. Super Group, founded in 1986, has been listed on the JSE since 1996, and includes supply chain, dealerships and fleet solutions businesses focused on offering a comprehensive range of services, utilising world-class skills and technology.

Our corporate identity reflects the high standards of operational excellence that we strive for within our group. We therefore adhere and demand strict adherence to our brand standards in the application of our logo both internally within our company and externally by our stakeholders, partners, suppliers and customers.

Super Group is a firm believer in the maxim that a company is only as good as its people. The Super Group employee is loyal, committed and enthusiastic, focusing on developing client relationships, and is supported by a corporate culture that is performance driven but grounded in a strong foundation of ethical and moral values. We will continue to invest in development of our people to ensure they have the appropriate skills to perform their job to the best of their abilities whilst adding value to our clients' operations.

At Super Group we are committed to the highest ethical standards in business. We expect high ethical standards of ourselves, our colleagues, stakeholders, partners, suppliers and customers. This code has been developed to make these values and expected behaviours clear.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

We declare that Super Group Ltd. is in compliance with the International Labour Organisation's (ILO) definition of decent work, namely equal opportunities for women and men to obtain decent and productive work, in conditions of freedom, equity, security and human dignity.

2. Strategic Vision

The strategic vision of Super Group is to provide end-to-end supply chain solutions, fleet management and dealership services to a diversified customer base in Africa, Australia, the United Kingdom, Europe and New Zealand and to become a leading transport logistics and mobility group in the countries in which it operates.

3. Our Values

- Trustworthiness.
- Open communication.
- Respect.
- Collaboration and knowledge sharing.
- Ownership and accountability for our purpose.
- Innovation and thinking.
- Recognition and fun.

4. Ethical Standards

At Super Group we are committed to the highest ethical standards in business. We are committed to implementing the Company's core principles and values when dealing with colleagues, customers, clients, government authorities, creditors, suppliers, the environment and the community as whole. These principles and values include that we:

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

- are focused on delivering excellence to our clients;
- always act in a trustworthy manner, affirming our integrity;
- reward initiative, leadership and innovation;
- encourage mutual respect, collaboration and knowledge sharing;
- foster a culture of ownership and accountability and recognise the contribution and importance of each employee;
- render products and services that meet the specifications and quality and safety criteria specified in the relevant contract documents and are safe for their intended use; and
- provide a positive and dynamic workplace environment, placing importance on the achievement of work/life balance.

Super Group is dedicated to delivering outstanding performance to all stakeholders, including employees, investors, customers and suppliers. We aspire to be the leader in our field while operating openly, with honesty, integrity and responsibility and maintaining a strong sense of corporate social responsibility. In maintaining our corporate social responsibility, Super Group conducts business ethically and according to our values, encourages community initiatives, considers the environment and ensures a safe and professional workplace.

We expect high ethical standards of ourselves and our colleagues in order to maintain community and stakeholder trust in us. This code has been developed to make these values and expected behaviours clear. It applies to all employees, contractors, volunteers, suppliers, agents and anyone who represents Super Group.

5. Fair and Ethical Decision Making

Super Group strives to deal fairly with our customers, suppliers, competitors and employees. We do not condone anyone taking unfair advantage of people or situations through unfair dealing or unethical behaviour.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

The values and responsibilities outlined in section 1 and 2 above should be used as the basis for determining the appropriate course of action when an employee is faced with making any business.

When making business decisions, employees must consider that the decision should:

- be in full compliance with all applicable local, national and international laws and regulations as well as contractual terms and conditions agreed upon with customers and suppliers that Super Group is committed to;
- be consistent with Super Group's policies, values and principles;
- be free from any conflict of interest and not lead to a personal gain that the employee would not otherwise be entitled to;
- not be perceived by a member of the public, colleagues, customers or suppliers as inappropriate; and
- be capable of withstanding scrutiny.

Fair competition laws are intended to promote vigorous competition in a free market. It is in Super Group's best interest to promote free and open competition. Super Group must make its own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition. We consider compliance with these laws of vital importance.

As part of our commitment to fair trading, employees will:

- fulfil Super Group's requirements in awarding orders, contracts and commitments to suppliers of goods and services on a sound business basis;
- not make decisions based on personal preferences or bias;
- not collude with any competitor of Super Group in respect of the sharing of customer information, fixing of prices or the rigging of tenders;
- not unfairly differentiate between customers when supplying products or services;

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

- not refuse to deal with, or discriminate against, a customer or supplier for any improper reason;
- not engage in any form of bribery, corruption or extortion and conduct business honestly and ethically in an open and transparent way;
- not engage in any form of actual or attempted money laundering;
- not use confidential company information to either engage in or support insider trading;
- ensure all business and commercial dealings are transparently performed and accurately recorded in the business' books and records;
- not give or accept of any gifts to create improper influence or obligate the recipient for any business opportunity (gift giving should occur sparingly and always be legitimate and aligned with company policy);
- not intimidate or threaten another person or organisation; and
- not make use of suppliers that source or supply counterfeit products.

Super Group has an anti-crime policy that addresses crime in general, including fraud and corruption. The Internal Audit Department is very active and makes use of both reactive and proactive approaches in dealing with criminal or unacceptable activity. Super Group makes of an external service provider to facilitate and handle the reporting of dishonesty, fraud and other inappropriate behaviour. Whistle-blowers may call 0800-007-117 with anonymous tip-offs 24 hours a day, 365 days a year. The hotline supports the Group's approach of zero tolerance of unethical behaviour. This provides employees, customers and suppliers with the opportunity to help the group identify and eradicate all forms of crime.

6. Protection of Company Property

INTELLECTUAL PROPERTY AND PERSONAL INFORMATION

- Super Group's confidential information and intellectual property rights must be safeguarded against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

Super Group.

- All and any personal information about individuals, such as Super Group's consumers or employees, must be handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations, for example the Protection of Personal Information (POPI) Act and the Promotion of Access to Information Act (PAIA).

PROTECTION OF CONFIDENTIAL INFORMATION

- Employees, business partners and suppliers should take all reasonable measures to prevent the disclosure of confidential Super Group information. The disclosure of any confidential, proprietary or sensitive information is strictly prohibited.

COMPANY ASSETS

- Physical property and resources are made available to each of us to help us do our jobs. When you safeguard the Company's assets, you safeguard our ability to grow and to thrive. Never lend, sell or give them away unless you are authorised to do so.

7. Labour Standards and Human Rights

The Bill of Rights, Chapter 2 of the Constitution, enshrines the fundamental human rights of all people living in South Africa. Super Group upholds these rights.

Super Group expects its directors and employees to comply with these principles and to act in the best interest of Super Group at all times. Super Group also expects its stakeholders, partners, suppliers and customers to comply and adhere to these principles.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

DIGNITY, FAIR TREATMENT AND NO HARASSMENT

- It is Super Group's objective to create an environment that promotes diversity, respect for human rights and equal opportunity where all employees are treated with dignity and fairness. Super Group has a zero-tolerance stance towards any form of unlawful discrimination, victimisation or harassment.

FORCED LABOUR AND CHILD LABOUR

- Super Group prohibits the use of any form of child labour or forced labour. Super Group has a zero tolerance policy in this regard. Super Group shall not employ any child that has not attained the minimum legal working age, and shall not make use of any involuntary labour.

WORKING HOURS AND LEAVE

- Super Group adheres to the applicable legislation with regards to working hours and leave including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations.

WAGES AND BENEFITS

- Super Group adheres to the applicable legislation with regards to wages and benefits. All workers shall be paid at least the minimum prescribed wage. Super Group provides its employees with information about their employment terms and conditions, including benefits, in a format and language they can easily understand, such as a written employment contract and a timely wage statement. Deductions from wages is permitted only if and to the extent prescribed by applicable law, regulations or collective bargaining agreements.

FREEDOM OF ASSOCIATION

- Freedom of association and collective bargaining are fundamental human rights. Super Group respects and promotes these rights which enable workers

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

to have a voice and representation. Super Group does not discriminate against any person because of their affiliation to any organisation of own choosing. Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or retaliation.

ANTI-DISCRIMINATION

- Super Group treats everyone with dignity and respect and provides equal opportunities and prohibits all discrimination, including but not limited to, race, gender, sex, sexual orientation, ethnic or social origin, colour, age, disability, religion, conscience, belief, culture, language and birth. Super Group does not tolerate humiliating or physical punishment or allow any Employee to be subject to verbal, psychological, physical or sexual harassment or abuse.

THIRD PARTY EMPLOYMENT AGENCIES

- Super Group only uses third-party recruitment agencies that are compliant with the Super Group Supplier Code of Conduct.

FAIR EMPLOYMENT PROCEDURES AND REMEDIES

- Super Group provides all employees with transparent, fair and confidential employment procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of their working relationship.

LAND RIGHTS OF COMMUNITIES

- Super Group respects the rights and title to property and land of the individual, indigenous people and local communities. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

GRIEVANCE SYSTEMS

- Super Group ensures that all employees have an effective mechanism to report grievances and that facilitates open communication between management and employees.

EMERGENCY PREPAREDNESS AND RESPONSE

- Super Group continuously identifies and assesses potential emergency situations and in turn develops and implements emergency plans and response procedures that will minimize harm to life, environment, and property.

INCIDENT MANAGEMENT

- Super Group has systems for workers to report health and safety incidents and near misses, as well as a system to investigate, track, and manage such reports. Super Group shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

WORKING AND LIVING CONDITIONS

- Super Group provides workers with reasonably accessible and clean toilet facilities and potable water.

8. Health and Safety

A commitment to Health and Safety sits at the very heart of our business. As such, Super Group will:

- maintain compliance with the Occupational Health and Safety (OHS) laws and regulations and any other relevant laws, regulations and codes of standards;
- maintain evidence of its safety excellence and an OHS Management System;
- outline the identified OHS risk for activities and their systems and methods to

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

effectively manage those risks;

- notify relevant authorities of any incidents and OHS performance associated with activities performed for Super Group; and
- maintain adequate insurance coverage including workers compensation.

Super Group will take all reasonable steps to fully comply with all environmental, health and safety legislation and regulations.

Please refer to the Group Human Resources Policies and/or Supplementary Subsidiary/Division Human Resources Policies for Health and Safety Policies.

9. Transformation

Super Group recognises the importance of implementing a broad based black economic empowerment (B-BBEE) programme that addresses the inequalities of the past through a dedicated and ongoing process.

10. Employee Responsibilities

Super Group's employees are expected to abide by and live the Company's Code of Conduct & Ethics at all times. Employees have the responsibility to:

- represent Super Group in a professional manner and ensure that personal and professional conduct does not bring Super Group into disrepute;
- work diligently with respect for timeframes and commitments;
- treat individuals fairly and with respect and not engage in discrimination, harassment or bullying behaviour of colleagues;
- be professional, helpful and courteous to colleagues, customers and suppliers;
- deal in a fair and responsible manner with each of your colleagues, and Super Group's customers and suppliers;
- comply with lawful instructions given by an authorised colleague;

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

- dress professionally and appropriately;
- be productive, work proactively and demonstrate initiative as appropriate;
- be open, inclusive and honest;
- be responsible and efficient in the use of work supplied resources;
- ensure that you do not use your position for personal gain;
- report conduct that breaches this Code or Super Group's policies; and
- not give any one supplier or customer unfair advantage.

Employees of Super Group are responsible for their own actions and for ensuring they are working in a manner consistent with this Code. Employees are also responsible for reporting events or omissions by others which breach the Code or any other Super Group policy or procedure. Any breaches can be reported (anonymously if desired) to direct line managers, who will escalate to a Senior Manager, or directly to Senior Management.

Employees should be aware that Super Group may take disciplinary action for breaches of the Code. This action may include counselling, official notification of unsatisfactory performance or dismissal.

11. Responsibilities to Sustainability

Super Group is committed to building a profitable and sustainable business for the benefit of all its stakeholders and the communities in which it operates. To this end, Super Group conducts its business in accordance with the all applicable environmental laws and regulations and engages in activities beneficial to the local community.

Environmental performance at Super Group is driven by a pragmatic, risk-based approach combined with a group-wide drive for efficient use of resources. We have regard for the environment and local community when carrying out our duties. We are committed to:

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

- be compliant with all applicable laws and regulations to protect the environment;
- maintain all legally required environmental permits, licenses, approvals and other certifications;
- improve our efficiency of energy, water, natural resource usage and handling and discharge of hazardous materials;
- cognisant that although Super Group does not operate in a manufacturing business, emissions are still produced through vehicle usage; we thus ensure that company vehicles are maintained strictly in accordance with manufacturer specification;
- have appropriate policies and controls to effectively manage their environmental performance.
- committed to a programme of continuous improvement as well as improved quality of service and outputs delivered;
- consciously attempt to improve energy efficiency through usage patterns and by partnering with suppliers and stakeholders that bring cleaner and more efficient fuels to the market;
- systematically identify, manage, reduce, and responsibly dispose of or recycle hazardous and non-hazardous waste;
- systematically identify, control, and reduce wastewater produced by our operations;
- regularly quantify, set targets, monitor progress, and reduce emissions of greenhouse gasses through conservation, use of clean energy, or other measures;
- identify, control, monitor, and reduce noise generated by our facilities or equipment that affects boundary noise levels; and
- regularly quantify, set targets, monitor progress, and reduce consumption of fossil fuel, water, hazardous substances, and natural resources through conservation, re-use, recycling, substitution, or other measures.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

12. Supplier's Responsibilities

Please refer to the Super Group's Supplier Code of Conduct.

13. Non Compliance

Super Group strongly supports a culture of speaking up for both suppliers and their employees without fear of retaliation against those who report actual or suspected breaches.

Employees, workers or contractors may report actual or suspected breaches of this Code to Super Group by phone or online. Reports can be submitted confidentially and anonymously through the Be Heard platform.

Super Group has an anti-crime policy that addresses crime in general, including fraud and corruption. Our internal Audit and Risk Department is very active and makes use of both reactive and proactive methods in dealing with criminal or other unacceptable behaviour.

Super Group also makes use of an external service provider (Be Heard) to facilitate and handle the reporting of dishonesty, fraud and other inappropriate behaviour in the workplace.

Be Heard contact details:-

- Telephone: 0800 007 117
- SMS: 44666
- E-mail: Tip-off@beheard.co.za

Whistle-blowers may contact Be Heard with anonymous tip-offs 24-hours a day, 365 days a year.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |

The hotline supports the Group's approach of zero tolerance of corrupt and unethical behaviour. It provides staff, customers and suppliers with the opportunity to help the group identify and eradicate all forms of crime.

Please take note that Be Heard is a tip-off reporting line. General workplace complaints and grievances must be dealt with through the Group's Grievance Procedure.

Super Group will investigate any concern raised and take appropriate corrective action.

| | | | |
|-----------------------------------|--|---------------------|-----------------|
| Policy Title | Super Group Code of Conduct and Ethics | Version | 2021/01 |
| Author | Graeme Barnard | Date issued | 25 January 2021 |
| Reviewed & Approved by | Super Group Executive Committee | Date Revised | 25 January 2021 |
| Disclosure | Public | | |