



## Supplier Code of Conduct and Ethics

<b>Policy Title</b>	Super Group	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

<b>SUPPLIER CODE OF CONDUCT AND ETHICS</b>	<b>3</b>
<b>1. About Super Group</b>	<b>3</b>
<b>2. Strategic Vision</b>	<b>4</b>
<b>3. Our Values</b>	<b>4</b>
<b>4. Labour Standards and Human Rights</b>	<b>4</b>
DIGNITY, FAIR TREATMENT AND NO HARASSMENT	5
FORCED LABOUR AND CHILD LABOUR	5
WORKING HOURS AND LEAVE	5
WAGES AND BENEFITS	5
FREEDOM OF ASSOCIATION	6
ANTI-DISCRIMINATION	6
<b>5. Business Ethics and Integrity</b>	<b>8</b>
COMPLIANCE WITH LEGISLATION	8
BRIBERY, CORRUPTION AND EXTORTION	8
WHISTLE-BLOWERS: BE HEARD CRIME REPORTING LINE	8
CONFLICT OF INTEREST	9
UNFAIR COMPETITION	9
PROTECTION OF CONFIDENTIAL INFORMATION	10
FINANCIAL RECORDS, MONEY LAUNDERING AND INSIDER TRADING	10
EXPORT CONTROLS	10
<b>6. Transformation</b>	<b>11</b>
<b>7. Health and Safety</b>	<b>11</b>
<b>8. Environment and Sustainability</b>	<b>13</b>
HAZARDOUS WASTE MANAGEMENT	13
NON-HAZARDOUS WASTE MANAGEMENT	13
WASTEWATER MANAGEMENT	13
STORMWATER MANAGEMENT	14
AIR EMISSIONS MANAGEMENT	14
BOUNDARY NOISE MANAGEMENT	14
RESOURCE CONSUMPTION MANAGEMENT	14
<b>9. Non Compliance</b>	<b>15</b>

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

# Supplier Code of Conduct 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. 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.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	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. Labour Standards and Human Rights

The Bill of Rights, Chapter 2 of the South African Constitution, enshrines the fundamental human rights of all people living in South Africa. Super Group upholds these rights, as well as those defined by the United Nations and enshrined in International Human Rights Law.

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

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

stakeholders, partners, suppliers and customers to comply and adhere to these principles.

#### DIGNITY, FAIR TREATMENT AND NO HARASSMENT

- Suppliers should envisage an environment that promotes diversity, respect for human rights and equal opportunity where all employees are treated with dignity and fairness. Our suppliers should refrain from unlawful discrimination, victimisation or harassment.

#### FORCED LABOUR AND CHILD LABOUR

- No supplier shall 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

- Suppliers should adhere 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

- Suppliers shall adhere to the applicable legislation with regards to wages and benefits. All their employees shall be paid at least the minimum prescribed wage. Suppliers shall provide their 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. Deduction from wages is permitted only if and to the extent prescribed by applicable law, regulations or collective bargaining agreements.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

## FREEDOM OF ASSOCIATION

- Freedom of association and collective bargaining are fundamental human rights. All suppliers should protect and promote this right, which enables their employees to have a voice and representation. We expect our suppliers not to discriminate against any person because of their affiliation to any organisation of their own choosing.

## ANTI-DISCRIMINATION

- We expect our suppliers to treat everyone with dignity and respect and provide equal opportunities and prohibit all forms of unfair 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. suppliers shall not tolerate humiliating or physical punishment or allow any of their employees to be subject to verbal, psychological, physical or sexual harassment or abuse.

## THIRD-PARTY EMPLOYMENT AGENCIES

- Suppliers shall ensure that any third-party recruitment agencies used are compliant with the provisions of this Code and the law.

## FAIR EMPLOYMENT PROCEDURES AND REMEDIES

- Suppliers must ensure that all of their employees are provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties that may arise as part of their working relationships.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

## LAND RIGHTS OF COMMUNITIES

- Suppliers must respect 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 such, must adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

## GRIEVANCE SYSTEMS

- Suppliers shall ensure that their employees have an effective mechanism to report grievances and must ensure that they facilitate open communication between management and employees.

## EMERGENCY PREPAREDNESS AND RESPONSE

- Suppliers shall identify and assess potential emergency situations. For each situation, suppliers shall develop and implement emergency plans and response procedures that will minimise harm to life, the environment, and property.

## INCIDENT MANAGEMENT

- Suppliers shall have a system for their employees to report health and safety incidents and near misses, as well as a system to investigate, track, and manage such reports. Suppliers shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate the return to work of affected employee(s).

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

## WORKING AND LIVING CONDITIONS

- Suppliers shall provide their employees with reasonably accessible and clean toilet facilities and potable water. Supplier-provided dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by suppliers or third-parties shall be clean and safe and provide reasonable living space.

## 5. Business Ethics and Integrity

### COMPLIANCE WITH LEGISLATION

- We expect our suppliers to be knowledgeable and comply with all applicable local, national and international laws and regulations, as well as contractual terms and conditions agreed upon with Super Group, and to deal fairly and act ethically in all matters. All legally required permits, approvals, licenses, registrations, inspections and related reports shall be in place, up to date and available for inspection upon request.

### BRIBERY, CORRUPTION AND EXTORTION

- Super Group has a zero-tolerance approach to bribery, corruption and extortion and conducts all its business honestly and ethically in an open and transparent manner. The same behaviour is required of all our suppliers. Suppliers may not act in any manner that transgresses anti-bribery legislation.

### WHISTLE-BLOWERS: BE HEARD CRIME REPORTING LINE

- 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 use of an external service provider to facilitate and handle the reporting of dishonesty, fraud and other inappropriate behaviour. Whistleblowers may call 0800-007-117 with anonymous tip-offs 24 hours a day, 365 days a year. The hotline supports the

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		



Group's approach of zero tolerance of unethical behaviour. This provides staff, customers and suppliers with the opportunity to help the Group identify and eradicate all forms of crime.

- We expect our suppliers to have the same zero tolerance approach to crime and corruption.

#### CONFLICT OF INTEREST

- Our suppliers must declare conflicts of interest (actual, potential or reasonably perceived) as soon as they become aware of them.
- The giving or acceptance of any gifts should not 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.

#### UNFAIR COMPETITION

- Our suppliers must conduct their business in compliance with competition legislation. Any anti-competitive conduct, restrictive practices such as price fixing, collusion, market sharing, bid rigging and kickbacks are prohibited. Our suppliers should not engage in business practices that will restrict or limit competition.

#### INTELLECTUAL PROPERTY AND PERSONAL INFORMATION

- Our suppliers shall respect Super Group's confidential information and intellectual property rights by safeguarding against misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable law and the contractual terms with 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, including the

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act 2 of 2000 (PAIA) in South Africa.

#### PROTECTION OF CONFIDENTIAL INFORMATION

- Our 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.

#### PRODUCT QUALITY AND RESPONSIBLE INNOVATION

- Products and services provided by our suppliers must be delivered to meet the specifications and quality and safety criteria specified in the relevant contract documents and must be safe for their intended use. Research and development must be conducted responsibly and based on good clinical practice and generally accepted scientific, technological and ethical principles.

#### COUNTERFEIT PARTS

- Our suppliers should not source or supply counterfeit products to Super Group.

#### FINANCIAL RECORDS, MONEY LAUNDERING AND INSIDER TRADING

- Suppliers must ensure that all business and commercial dealings are transparently performed and accurately recorded in the supplier's books and records. They must ensure that there is no actual or attempted participation in money laundering. No confidential information in the supplier's possession regarding Super Group may be used to either engage in or support insider trading.

#### EXPORT CONTROLS

- Our suppliers are expected to implement export controls in line with all

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

applicable legislation and regulations.

## 6. Transformation

Super Group recognises the importance of implementing a broad based black economic empowerment (B-BBEE) programme in South Africa that addresses the inequalities of the past through a dedicated and ongoing process. It is expected that suppliers share the same values to ensure that the economy is structured and transformed to enable the meaningful participation of all its citizens. Our suppliers must at all times be in possession of valid B-BBEE certificates or affidavits, whichever is applicable.

## 7. Health and Safety

A commitment to Health and Safety sits at the very heart of our business. As such, we require all our suppliers to:

- maintain compliance with the Occupational Health and Safety laws and regulations and any other relevant laws, regulations and codes of standards;
- provide demonstrated evidence of their safety excellence and an Occupational Health and Safety Management system;
- outline the identified Occupational Health and Safety risk for activities and their systems and methods to effectively manage those risks;
- notify Super Group of any incidents and Occupational Health and Safety performance associated with activities performed for Super Group; and
- maintain adequate insurance coverage including employee compensation.

Suppliers must take all reasonable steps to fully comply with all environmental, health and safety legislation and regulations.

We also require that suppliers do not engage in business practices that will restrict or limit competition. In particular:

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

- never discuss or reach an understanding or arrangement with a competitor about supplies, prices, terms, tenders, other competitors or other factors relevant to competition;
- never try to influence another supplier's or competitor's dealings with Super Group;
- not to take advantage of others' disadvantage by acting unfairly or unconscionably;
- not to supply goods and services in a manner that contravenes the Trade Practices Act or other legislation;
- not mislead or deceive with advertising, predictions and opinion; and
- refrain from discussing Super Group's business or information in the media, unless duly authorised.

By complying with the requirements outlined in this document, suppliers will be able to advance their business objectives and interests in a fair and ethical manner. All of our suppliers are required to comply with this Code; accordingly, doing so will not advantage them in any way in their dealings with Super Group. It is also important that suppliers are aware of the consequences of not complying with Super Group's ethical requirements when doing business with us. Any corrupt or unethical conduct could lead to:

- Termination of contracts
- Loss of future work
- Loss of reputation
- Investigation for corruption
- Matters being referred for criminal investigation.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

## 8. Environment and Sustainability

We are responsible for the environment and seek opportunities to reduce our environmental footprint. We aim to protect and conserve land, air, water, biodiversity and energy resources.

We expect our suppliers to:

- Comply with all applicable laws and regulations to protect the environment.
- Maintain all legally required environmental permits, licenses, approvals and other certifications.
- Improve their efficiency of energy, water and natural resource usage.
- Responsibly manage their air emissions, water quality and handling of hazardous materials.
- Have appropriate policies and controls to effectively manage their environmental performance.

### HAZARDOUS WASTE MANAGEMENT

- Where applicable, suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous waste.

### NON-HAZARDOUS WASTE MANAGEMENT

- Where applicable, suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous waste.

### WASTEWATER MANAGEMENT

- Where applicable suppliers shall implement a systematic approach to identify, control, and reduce wastewater produced by their operations. This includes conducting routine monitoring of the performance of their wastewater treatment systems.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

## STORMWATER MANAGEMENT

- Where applicable, suppliers shall implement a systematic approach to prevent contamination of stormwater runoff. Suppliers shall prevent illegal discharges and spills from entering storm drains, the public water supply, or public bodies of water.

## AIR EMISSIONS MANAGEMENT

- Where applicable, suppliers shall identify, manage, reduce, and responsibly control air emissions emanating from their operations that pose a hazard to the environment. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.
- Where applicable, suppliers shall regularly quantify, set targets, monitor progress, and reduce its emissions of greenhouse gases through conservation, use of clean energy, or other measures.

## BOUNDARY NOISE MANAGEMENT

- Where applicable, suppliers shall identify, control, monitor, and reduce noise generated by their facilities or equipment that affects boundary noise levels.

## RESOURCE CONSUMPTION MANAGEMENT

- Where applicable, suppliers shall 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.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

## 9. Non Compliance

By complying with the requirements outlined in this document, suppliers will be able to advance their business objectives and interests in a fair and ethical manner. All of our suppliers are required to comply with this Code; accordingly, doing so will not advantage them in any way in their dealings with Super Group.

Super Group reserves the right to terminate a business relationship with any supplier that does not comply with or that transgresses the provisions of this Code of Conduct.

Any failure to comply with this Code (including any failure by an employee of Super Group or anyone acting on behalf of Super Group) of which the supplier is aware should be reported to Super Group as soon as possible. Failure to do so will be considered a breach of this policy.

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.

Suppliers, their employees, workers or contractors may report actual or suspected breaches of this policy 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.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		

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.

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.

Super Group will investigate any concern raised and discuss findings with the supplier. The supplier shall assist with any such investigation and provide access to any information reasonably requested.

If remediation is required, the supplier will devise corrective action and inform Super Group of this action, as well as the implementation plan and timeline to effectively and promptly resolve the breach.

<b>Policy Title</b>	Super Group Supplier Code of Conduct	<b>Version</b>	2021/01
<b>Author</b>	Graeme Barnard	<b>Date issued</b>	25 January 2021
<b>Reviewed &amp; Approved by</b>	Super Group Executive Committee	<b>Date Revised</b>	25 January 2021
<b>Disclosure</b>	Public		