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Introduction

All Columbus Stainless (Pty) Ltd (hereinafter referred to as Columbus) personnel are expected to conduct company business in a legal and ethical manner. Compliance with competition law falls within the framework of our code of conduct, which applies equally to all our business transactions throughout the world, and to the individual behaviour of employees in conducting Columbus' business. Columbus has a policy of strict compliance with competition law wherever it operates. All Columbus personnel are required to adhere to this policy and breaches of competition law will not be tolerated.

Applicability

This policy extends to all of the company's operations without exceptions.

Objectives

The objectives of this Policy are to provide a framework to employees not only to ensure compliance with legislation, but also to develop a consistent approach so that when employees are operating under Columbus' name, they apply business practices which are in line with the Company's reputation and standards.

Responsibility


Each Columbus employee is responsible for compliance with the applicable competitions laws. The responsibility for supervision of the company's Compliance Programme is delegated to the GM: Legal and Transformation who is also the Compliance Officer.

Compliance

Every employee, likely to have contact with suppliers, customers, competitors or professional associations, either directly or otherwise (hereinafter referred to as a relevant employee), should:

- read and study the policies, practices and recommendations, as outlined in the Competition Law Compliance Manual;
- refrain from making any statements, whether internally or in public, either in writing or otherwise, which may give the impression that Columbus is engaging in anti-competitive behaviour;
- be constantly vigilant to ensure competition law compliance;
- consult with the Legal Department in respect to activities which may have competition law implications; and
- attend competition law compliance sessions as presented by Columbus management.

At least once every two years and, in the case of any person recruited or promoted to be a relevant employee, within three months of taking up his or her new role, each such employee must undertake competition law compliance training. Thereafter he or she will be required to sign the competition law compliance declaration.

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Mandatory Consultation or notification with Columbus Legal Department

Notifying or consulting the Legal Department is mandatory in cases where:

- any doubts exist as to whether any act, intended or not, may infringe or has infringed competition law; and
- any doubts exist as to whether any statement (either in writing or otherwise) may give the impression that an employee and/or Columbus could be involved in an infringement of competition law.

These provisions also apply to managers regarding acts or statements which involve any of their subordinates.

It is Columbus' policy to foster a climate where employees know that they will be supported if they report suspicious or questionable activity to their line manager or to the Legal Department. Employees are encouraged to immediately report illegal, unethical or improper conduct.

Reporting

If the Compliance Officer becomes aware that an infringement of the policy has occurred and/or that Columbus may be at a serious risk of infringing competition law, the matter shall immediately be reported to the CEO who must consider the matter and take appropriate action.

Consequences of non-compliance or of an infringement

a. Necessary measures

In case of non-compliance or infringement, Columbus will make sure that the infringement is terminated immediately after confirmation that an infringement has taken place.

b. Labour Law consequences

Non-compliance by an employee with any provision of this Policy, in particular any involvement in any act prohibited by competition law, may give rise to labour law consequences, including appropriate disciplinary action.

Revision history



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Revision	Date	Author	Remark
0	16 March 2015	Kutala Bizana	Created
1	25/08/2021	Kutala Bizana	Changed the Chief Executive Officer's details from Lucien Matthews to Johan Strydom.

Document Approval

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Prepared by	Secretary Legal	9189
Approved by	General Manager Transformation	9281
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