



## 1. INTRODUCTION

To help directors and employees stay on track and live Columbus values, a Business Ethics Policy has been implemented. In addition to the Policy, this Supplementary Procedure has been developed to assist directors and employees in applying the Business Ethics Policy in their daily activities and decision-making, and in dealing with specific ethics issues in the workplace. The Supplementary Procedure will be reviewed on a regular basis to ensure that emerging ethics issues are addressed.

## 2. SCOPE

This procedure is not intended to provide an exhaustive list of ethics issues, or to be all-encompassing on “dos and don’ts”, but rather highlights those ethics issues that were identified as a concern to Columbus. This procedure will be updated as and when new ethics issues in the workplace arise that require guidance and/or specific instructions as to how the issues should be managed at Columbus.

## 3. DEFINITIONS

The following definitions are important in dealing with specific ethics issues in the workplace.

**Bribes and kickbacks:** include anything provided directly or indirectly for the purpose of improperly obtaining or rewarding favourable treatment.


**Business courtesy:** a business courtesy means a gift, or favour from a person or an entity, regardless of whether a business relationship exists between Columbus and that person or entity, for which a fair market value is not paid by the recipient. A business courtesy may be a tangible or an intangible benefit, such as non-monetary gifts, meals, drinks, entertainment, hospitality, recreation, attendance prizes, transportation, discounts, tickets, passes, promotional items or the use of a donor's time, materials or equipment.

**Business Ethics Policy:** Business Ethics Policy highlights the ethical values that explain what behaviour is good and right in the workplace. It sets the standard of ethical behaviour within the organisation, and guides employees in making ethical decisions. Business Ethics Policy explains what behaviour is acceptable within Columbus, and highlights how Columbus values must be lived within the workplace.

**Director:** director means a member of the board of Columbus Stainless (Pty) Ltd, or an alternate director of such board.

**Discrimination:** discrimination is defined as making or seeing a distinction, or differentiating between persons, which results in them being treated unfavourably based on prejudice, especially regarding race, colour, age, gender, sexual orientation, religion, culture, language, disability, or any other grounds.

The Constitution prohibits unfair discrimination. Fair discrimination is permitted with regards to redressing of past injustices. Columbus supports a workplace that is free from unfair discrimination as per the Constitution. It furthermore appreciates and values the diversity of its

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 2 of 15

workforce, and does not discriminate against race, colour, age, gender, sexual orientation, religion, culture, language, disability, or any other grounds.

**Employees:** also referred to as staff members. Employees mean individuals employed by Columbus on a permanent basis, Columbus learners, and fixed-term employees, which include temporary employees, part-time employees.

**Entertainment:** is provided by outside parties for the purpose of relaxation and recreation. Typical examples in Columbus include, functions or sports events arranged by suppliers, or invitations or tickets given to employees to attend sports events. Columbus employees must only participate in such events or functions if formally approved by their managers and in compliance with the Conflict of Interest Policy, and other applicable standards, policies and procedures.

**Ethics:** ethics means distinguishing between what is right and wrong in order to do what is right in the interaction with stakeholders. Doing what is right, is also interpreted as doing what is good, or avoiding doing harm.

**Ethical behaviour:** ethical behaviour means desirable, acceptable conduct (actions and decisions) that will bring about (consequences/outcome) what is good and right in the interaction with others. Thus, behaviour is ethical when due consideration is given to, not only that which is good for oneself, but also what is good for others. In order to do what is good and right, ethical values must be used in decision making and conduct.

For example, when I tell the **truth**, and I treat my manager and colleagues with **respect**, my actions/behaviour has a positive effect on myself, my manager and colleagues. As a result of my behaviour, they **feel respected** and they can **trust** me because I am **honest**. The outcome is good, because I have behaved ethically. Columbus' Business Ethics Policy describes the desirable, acceptable, ethical behaviour that is required of all employees, both in our personal conduct at work, as well as in our relationships with Columbus stakeholders.

**Ethical decision-making:** every person interacts with someone or something (e.g. environment) on a daily basis. This interaction is based on decisions, which have consequences, whether positive or negative. Ethical decision-making is characterised by decisions based on ethical values and principles. Thus, ethical decision-making can also be referred to as responsible decision-making.

Ethical decision-making means the following has been done as part of the decision-making process, before the interaction takes place:

- a) Identify the stakeholders that will be affected by the decision;
- b) Consider the consequence/effect of the decision on each stakeholder;
- c) Proceed with the option/solution that will promote what is good (or will avoid doing harm) or will have the least negative effect on all the stakeholders.

Before a decision is made, place yourself in the other stakeholder's (person or animal or the environment, or entity, etc.) position, and ask yourself: if this decision is applied to me, how will I feel about it? Will I see the decision as good and right and not doing harm?

**Ethical dilemmas:** an ethical dilemma occurs when you have to decide between two or more right courses of action, or choose between two or more ethical values that cannot all be lived up to in the situation.



**Ethical values:** these are universally accepted norms and standards for ethical judgement and behaviour, such as honesty, respect, fairness, etc.

**Facilitation payments** are gratuities paid to officials (usually government employees) to expedite a service or routine administrative action that these individuals ordinarily perform. Columbus prohibits these payments.

**Favouritism:** favouritism refers to the practice of showing favour to, or giving preference to some person or group, to the detriment or at the expense of another person or group that is entitled to equal treatment or opportunity. Within Columbus, each person must be valued as an individual and as an important member of the team, and therefore favouritism will not be condoned. (Also refer to nepotism as defined).

When one perceives the actions of a colleague or manager or supervisor as favouritism, it is very important to address this in the right manner:

- a) Try to establish whether the perceived favouritism is reality or perception. Within Columbus, one has to accept the fact that not all people will be close friends, yet it remains unacceptable that personal preferences harm the values of respect, trust and fairness that Columbus wants to create within the organisation.
- b) Try to determine whether your experience of being discriminated against affects the broader Columbus environment and harms the organizational culture. For example, does it affect the morale within the department as well? Does it negatively affect Columbus' reputation for being an ethical organisation?
- c) Try to determine whether you can do anything to find a reasonable resolution to the issue. Could you find a way to present your case to the person that you see acting unfairly in a non-threatening, constructive manner?
- d) Talk this over with the Legal Department, or if you prefer, your direct manager or supervisor. Try to come up with a solution that would build trust and foster transparency, rather than secrecy, gossip and negativity.


**Gifts:** are items and/or services of value, which are given by outside parties.

**Gratuities:** are rewards or incentives provided in exchange for, or in recognition of the completion or delivery of work, a product, or an achievement. Columbus employees must not accept any money, gift vouchers, rewards or incentives from external parties. Should a customer, for example, want to recognise exceptional service received from Columbus employee, then the employee's manager should be informed, in order to reward the employee through proper Columbus channels.

**Hospitality:** is the relationship between a guest and a host to make that guest feel welcome, and cared for. It is also the act or practice of being hospitable, that is, the reception and entertainment of guests, visitors, or strangers, with goodwill.

**Manager:** manager includes a supervisor and means any employee with staff reporting directly to him/her.

**Nepotism:** nepotism is a specific form of favouritism. It entails showing favour or preference towards relatives based upon that relationship, rather than on an objective evaluation of ability or suitability. For example, offering employment to a relative, despite the fact that there are others who are better qualified and willing to perform the job, would be considered a form of nepotism,

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 4 of 15

which is not allowed in Columbus. (A relative in this context is someone who is related through blood, marriage or adoption).

**Private work:** private work includes private interests, and means any employment or commercial activity, or any other interests embarked on by an employee outside the scope of his/her Columbus employment.

**Professionalism:** in Columbus, directors and employees demonstrate professionalism by paying attention to detail, demonstrating expertise in their fields, rendering excellent quality services, behaving above reproach, and giving their best to Columbus at all times.

**Promotional items:** these are items with no significant, lasting or commercial value (thus R50 or less) that are often widely distributed, and usually display a person or firm's name, logo, etc. Examples include calendars, desk pads, lanyards; conference pens/writing pads, and conference bags.

**Respect:** respect is demonstrated when you show consideration for, or appreciate someone or something. For example, appreciating colleagues and staff members; being considerate towards customers' needs and expectations, etc. When an employee or director shows respect, he/she treats others in the same manner in which he/she wants to be treated. It also means that others' assets are treated in the same way in which the employee or director expects others to treat his/her personal assets.

**Stakeholder(s):** broadly defined, stakeholder(s) refer to any group, individual, or thing (e.g. environment) that can affect, or is affected by, the achievement of the organisation's objectives. Columbus' stakeholders include its shareholder, Board of Directors, employees, organised labour, customers, suppliers, the environment and the communities in which Columbus operates.


**Supplier(s):** supplier means any person or entity that does business with Columbus or tenders to do business with Columbus, or is registered on Columbus' supplier database, such as consultants, contractors, sub-contractors, and providers of goods and services.

**Values:** values refer to your core beliefs, which define who you are, what you believe in and what is important to you. Values influence your behaviour and motivate your decisions. For example, if you value honesty, you will always tell the truth.

Values do not only apply to individuals but also to organisations. Columbus' core values are:

- Safety as a way of life
- Quality in everything we do
- My plant – my pride
- Make recognition a habit
- Trust & respect – earned & valued by all
- We count on one another
- Delivery value to our customers
- Practical care for our environment
- Sustainability through flexibility & continuous improvement

These values describe what is important to the organisation, what it stands for and what it believes in. Columbus directors and employees represent the organisation, and are in fact 'Columbus'. Therefore, directors and employees need to demonstrate Columbus values in day-

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 5 of 15

to-day decisions and actions. Business Ethics Policy guides employees in living these values, as well as other ethical values that Columbus adopted.

#### **4. ROLES AND RESPONSIBILITIES**

Columbus is committed to maintaining the highest ethical standards and principles in all its business undertakings, and requires the same from its directors and employees in fulfilling their responsibilities.

##### **4.1 Director and employee responsibilities:**


- 4.1.1 Compliance with Columbus Business Ethics Policy, Supplementary Procedure and ethics-related policies is required of all directors and employees.
- 4.1.2 Directors and employees must therefore be familiar with ethics-related policies, and receive proper training on these.
- 4.1.3 Directors and employees must request detailed information from managers, supervisors and policy custodians regarding policies and procedures affecting their work, and ensure that they understand and comply with these.
- 4.1.4 Directors and employees must use the Business Ethics Policy to guide their actions and decisions, especially when in doubt, or if there are no rules or policies that address the specific situation.
- 4.1.5 Use the appropriate channels to report unethical behaviour, crime, irregularities and grievances. Compliance with the Protected Disclosures Act, 2000 (Act No. 26 of 2000) is imperative in order for Columbus to protect directors and employees, who have reported suspected illegal activities and violations of the Business Ethics Policy, against any form of victimisation or occupational detriment.

##### **4.2 Managerial responsibilities**

In addition to their general rights and responsibilities as employees, managers and supervisors have additional responsibilities resulting from their seniority and the nature of their managerial/supervisory duties:

###### **4.2.1 Managers and supervisors are required to:**

- a) make a personal commitment to act in accordance with the Business Ethics Policy, communicate this commitment to staff members, and lead by example;
- b) guide staff members to behave in accordance with the Policy;
- c) identify ethics risks in the department, section, and/or BU, and establish ways to mitigate these risks, and to address potential contraventions of the Policy;
- d) take appropriate action to correct behavioural deviations; and

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 6 of 15

e) enforce disciplinary action when appropriate.

4.2.2 Managers and supervisors are required to ensure that their staff members (employees) are in possession of the Business Ethics Policy; and sensitised to the code, Supplementary Procedure and ethics-related policies, through staff dialogue sessions facilitated by managers and supervisors. Employees need to know how to apply the Business Ethics Policy and ethical standards in their specific work environments.

4.2.3 Managers and supervisors are accountable for ensuring that all new employees attend induction programme, as well as formal ethics training workshops.

4.2.4 Managers and supervisors are accountable for ensuring that all employees attend a formal ethics workshop at least every two years.

4.2.5 Managers and supervisors are required to give their staff members opportunities to discuss ethics issues and concerns both formally (for example, staff meetings) and informally (one-to-one meetings). It is recommended that “ethics” be a standing agenda item for staff meetings, so as to encourage ethics dialogue.

4.2.6 Managers and supervisors must not, under any circumstances, victimise staff members who report unethical behaviour, and/or violations of the law and policies. Such behaviour will lead to disciplinary action.

### 4.3 Other role players’ responsibilities:

Columbus Board and Executive Committee members set the tone from the top, and are thus required to demonstrate exemplary ethical leadership in word and deed.


Human resource practitioners are required to ensure that new employees receive the Business Ethics Policy as part of the sign-on documentation that is given to them on the first day of employment. New employees must also be registered to attend an induction programme within one month of joining Columbus.

All individuals providing a service to Columbus must be made aware of, and are expected to adhere to, Columbus’ standards of conduct. Therefore, Purchasing Department is required to ensure that suppliers receive a copy of the Business Ethics Policy as part of the contract documentation. The Supplementary Procedure should be made available on request.

The Business Ethics Policy and Supplementary Procedure will be available to all stakeholders, including customers, and other organisations on request. These requests must be referred to the Legal Department.

The Legal Department must develop ethics training material and provide training for ongoing ethics awareness within the organisation. These interventions must be monitored and reported to Exec and the Board.

Apart from employee and director commitment to ethical behaviour, and the role that managers and supervisors play in instilling an ethical culture through ethics awareness, communication,

 <p style="text-align: center;"><b>Columbus Stainless (Pty) Ltd</b></p>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>	Revision: 3
Implementation Date: 04 October 2022	Page 7 of 15

training and disciplinary action for non-compliance, the functions mentioned below are responsible for further entrenching an ethical culture within the organisation:

- **Ethics Committee**  
Ethics Committee is the custodian of the whistle-blowing channel to report crime and irregularities. It ensures that this resource is confidential, and that all incidents reported are analysed in order to refer these for investigation and resolution by the appropriate department(s) and managers.
  
- **Internal Audit:**  
Determines whether or not Columbus network of risk management, control and corporate governance processes, as designed and represented by management, is adequate and functioning as intended.
  
- **Human Resources Department – Industrial Relations:**  
Ensures that grievances are effectively addressed and disciplinary action is taken against employees in terms of the Disciplinary Code and Procedure.
  
- **Human Resources Division – Recruitment**  
Conducts exit interviews and analyse the data to identify trends, and to recommend retention strategies. The trends with recommended strategies are shared with management, to ensure that the strategies are revised, where possible, to address the concerns.

## 5 BUSINESS COURTESIES

Columbus is committed to fair, objective and transparent business dealings, and for this reason care must be taken when accepting or offering any business courtesies, as defined.


Business courtesies are used to build good business relationships, and are offered as a kind gesture and to show courteousness or respect. Business courtesies must only be offered or accepted for these reasons.

Directors and employees must not offer or accept business courtesies that are intended to improperly influence a person's objectivity or business decisions (conflict of interest), or to bribe someone, or to create a feeling of obligation, or to gain favour above another.

Business courtesies must not negatively affect Columbus' image and reputation.

The value of a business courtesy must not exceed R2500. This specification has been included to assist directors and employees in identifying an expensive courtesy. Thus, the value of any business courtesy exceeding R2500 is considered expensive and inappropriate, and must not be offered or accepted, however it must still be declared on the electronic gift form.

It is important to note that the value of the gift is not the only guideline. An inexpensive courtesy may also be unacceptable if the motive for giving or accepting it is not ethical.

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 8 of 15

It is strictly prohibited to accept a gift from a potential supplier, if the supplier or potential supplier is in the process of tendering for a contract from Columbus.

A holiday whether part paid or fully paid or any travel discount offered by a supplier or business customer will be deemed a gift in terms of this policy.

**All gifts** should be declared and recorded whether accepted or declined in the gifts form within 7 (seven) days offering thereof.

**It is important that the Gift Declaration Form should not be seen simply as a control to ensure that all business courtesies are recorded, nor should it create the assumption that unacceptable business courtesies may be offered or received as long as they are recorded.** The objectives of the Gift Declaration Forms are to provide transparency, to demonstrate commitment to ethical business practices, and to protect the image and reputation of both Columbus and its directors and employees by ensuring that directors and employees only offer and accept business courtesies that are ethical and acceptable.

If a director or employee is offered or has accepted unacceptable business courtesies, then the appropriate disciplinary process must be followed.

The relevant departmental secretary is to forward an extract from the gifts register to the Legal Department on a monthly basis.

A business courtesy may be a tangible or intangible benefit such as meals, drinks, entertainment, promotional materials or invitations to recreational activities such as corporate functions, sporting events or theatre tickets.

Employees may accept such courtesy if doing so is:

- Appropriate and serves a legitimate business purpose
- In the case of attendance of a recreational event, attendance will not cause either the employee or the company embarrassment and has been approved by the relevant General Manager or Chief Executive Officer.

Employees should avoid a pattern of accepting frequent gifts or business courtesies from the same person or company.

Directors and employees are not only bound by Columbus's policies and regulations concerning business courtesies; but must also be aware of, and not transgress, similar regulations binding the recipient of business courtesies offered by Columbus.

Compliance with these regulations will assist directors and employees in making ethical decisions about business courtesies. However, if employees or directors are in doubt whether a courtesy will be acceptable then the Legal Department must be contacted for advice or prior permission must be obtained from managers before business courtesies are offered or accepted.





## **6. CONFLICTS OF INTEREST**

A conflict of interest arises when an employee or director's objectivity and/or the decisions to be taken on behalf of the organisation, are compromised by the personal interests of the individual.

A conflict of interest can be a direct (actual) conflict, a perceived conflict or a potential conflict. Any of these circumstances can result in unethical behaviour, as conflicts undermine fairness, objectivity and transparency. Conflicts of interest can also negatively affect productivity, as well as Columbus' and the employee's and director's image and reputation. As a result, Columbus' stakeholders lose trust in the organisation and in its directors and employees.

The "trust test" can be performed by directors and employees to determine whether or not the individual is in a conflict-of-interest situation. Ask yourself whether Columbus, the board, your colleagues, customers, suppliers or members of the general public will view your decision as fair and objective (trust your judgement), if they knew that you were in that specific situation.

Directors and employees must read and comply with Columbus' Conflict of Interest Policy, which provides detailed information and requirements relating to conflicts of interest.

## **7. PRIVATE WORK**

Private work could have a negative impact on an employee's ability to perform his/her Columbus duties, and/or create a conflict of interest, or create a conflicting interest when an employee has to choose between Columbus' interests and that of the employee. For this reason, employees are discouraged from performing private work. Approval should be obtained from the General Manager. If they do perform private work they should ensure that private work does not interfere with the employee's duty to act in Columbus' best interest.


## **8. SPONSORSHIP**

Sponsorship is the negotiated provision of funds, goods and services such as labour or facilities in exchange for advertising or publicity, or any other rights or forms of acknowledgment which are agreed upon.

Columbus recognizes that situations may arise where the Company may grant or solicit a sponsorship or co-sponsorship of an event or activity. Sponsorships may be granted or solicited from parties who may be willing to participate in activities sponsored by the Company and who will provide the Company with rights to the sponsored event or activity in terms of the sponsorship agreement.

No sponsorship may be granted or elicited without a written sponsorship agreement outlining the negotiated terms for a sponsorship. An agreement may take the form of an exchange of letters, but shall be null and void unless signed by the Chief Executive Officer, or his mandated representative.

Any sponsorship activity must be consistent with the values, corporate purpose and goals of Columbus. Employees are not permitted to personally benefit as a result of a sponsorship, unless

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 10 of 15

prior written agreement is obtained from the Chief Executive Officer in consultation with the Ethics Officer.

Final authority over any sponsorship or sponsorship agreement ultimately rests with the Chief Executive Officer.

## 9. RELATIONSHIPS WITH COLUMBUS' STAKEHOLDERS

Columbus is committed to treating its customers, suppliers, and other stakeholders with respect by being compassionate, and by considering the rights, dignity, and well-being of its stakeholders in day-to-day interactions.

Columbus is committed to providing support to economic and social projects, particularly in communities where it operates, as well as enhancing the quality of life in communities. These corporate social investments are managed by Human Resources.

### 9.1 Relationships with suppliers:

Columbus does not support child labour, and will not do business with entities that make use of child labour. (The International Labour Organisation defines child labour as “work situations where children are compelled to work on a regular basis to earn a living for themselves and their families, and as a result are disadvantaged educationally and socially; where children work in conditions that are exploitive and damaging to their health and to their physical and mental development; where they are separated from families, often deprived of educational and training opportunities; and they are forced to lead prematurely adult lives”).


The procurement of goods and service on behalf of Columbus must be made on the basis of the constitutional and ethical principles of fairness, equitability, transparency, competitiveness and cost-effectiveness. Suppliers engaging in a competitive tendering process must be treated with fairness and equality so that no one supplier is unfairly given any competitive advantages that will influence the ranking of suppliers and the awarding of orders and/or contracts.

In order to demonstrate integrity, Columbus directors and employees must not accept any discount on personal purchases that could be seen to be offered because of a supplier's relationship with the employee or director or with Columbus, unless the same discount is available to all other members of the public. Similarly, Columbus' purchasing power must not be misused for personal benefit to buy goods, materials or services at terms not available to all Columbus employees.

It is unethical for directors and employees to force a concession from a supplier or any other stakeholder for personal benefit, which would not otherwise be obtainable.

The proprietary data and confidential information of a supplier or potential supplier must also be protected. Directors and employees are responsible for complying with supplier-imposed limitations governing the use of supplier information, including documents and computer software.

All directors, employees, suppliers and others acting on behalf of Columbus are prohibited from providing, attempting to provide, or offering to provide kickbacks; and from soliciting, accepting, or attempting to accept a kickback.

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 11 of 15

No form of improper influence, bribery or unethical conduct by employees, directors, suppliers or customers is to be tolerated and such conduct must be reported to Columbus' Whistle-blowing hot-line (013 247 3272).

Failure of suppliers to adhere to Columbus' ethical standards must be reported to the Legal Department.

Action will be taken against any supplier found to be engaging in unethical practices and in contravention of Columbus' ethical conduct, which includes removal from Columbus database of suppliers.

## 10 HARASSMENT AND SEXUAL HARASSMENT

All Columbus directors and employees, as well as any other individuals dealing with Columbus, have the right to be treated with dignity and respect. Columbus commits itself to providing a work environment that is free of harassment and sexual harassment. Despite it being unethical, sexual harassment is also prohibited because it is unlawful, and against public policy.

**Harassment** is verbal or physical conduct that shows hostility or aversion towards an individual (whether an employee, customer, supplier, etc) because of the person's race, skin colour, religion, gender, national origin, age, class, disability or sexual orientation.

**Sexual harassment is** unwelcome sexual advances, requests for sexual favours, and other verbal, non-verbal or physical conduct of a sexual nature.

Harassment and/or sexual harassment may involve the following:

- Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance;
- Adversely affects an individual's employment opportunities.


Anyone has the right at any time to raise the issue of sexual, or any other harassment without fear of discrimination, victimisation or retaliated reprisal. Anyone subjected to any form of harassment or sexual harassment, or suspecting harassment or sexual harassment, or anyone subjected to victimisation as a result of reporting this misconduct, must report this to his/her manager or supervisors or any of the following:

- Legal Department;
- Human resources consultants/managers
- Industrial relations practitioners

Any director or employee engaging in harassing behaviour (whether towards another employee, supplier, or customer, etc.) is subject to disciplinary action including dismissal.

## 11. PROTECTION AND PROPER USE OF COLUMBUS ASSETS

Assets and property of Columbus, its customers and its suppliers must be treated with the same respect as that with which directors and employees would treat their own personal assets and

 <p style="text-align: center;"><b>Columbus Stainless (Pty) Ltd</b></p>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>	Revision: 3
Implementation Date: 04 October 2022	Page 12 of 15

property. The manner in which Columbus assets are used and cared for affects the financial well-being of the organisation and the quality of its service to customers. Directors and employees therefore have a direct interest and responsibility in ensuring that assets are properly safeguarded and used wisely, and effectively.

Assets and resources must be protected against loss, damage, theft, abuse and misuse, (must be used strictly for their intended purpose). Financial statements, records and expense reports must be accurate and complete. Columbus property must not be used for personal or outside activities, nor be disposed of, without the relevant written authorisation. It must be noted that taking any Columbus property without prior permission is regarded as theft and an employee or director engaging in such action is subject to immediate disciplinary action as well as any other appropriate action. Any damage, abuse or misuse of assets and resources must be reported to management, or through the whistle-blowing/hot-line 013 247 3272, in order to be investigated and for appropriate disciplinary action to be taken.

**Examples of assets include, but are not limited to, the following:** equipment, supplies, tools, inventory, cash and cash equivalents, computer systems and equipment, computer software, vehicles, travel and subsistence allowances, etc. Other types of Columbus property that are included in the above category for the purpose of the Business Ethics Policy and this document, but that are not necessarily “assets” in the accounting sense, include records or reports, proprietary information, intellectual property or other sensitive materials and e-mail, as well as SMS or voice mail communications when using a telephone that is the property of Columbus. Columbus time, (that is, time spent on the job, travelling on business, conducting business activities or otherwise representing the organisation) and overtime are also considered as Columbus asset.


## 12. **SECRECY**

Employees are required not to divulge any confidential information about the Company’s finances, business activities and relationships, manufacturing processes, inventions, patents, know-how or any confidential information of the Company, save to the extent necessary in the normal execution of duties.

## 13. **EMPLOYEE DIVERSITY**

There is only one way to treat people: fairly and respectfully. Columbus respects and values the cultural diversity and uniqueness of each employee. A successful business is built by valuing and maximising each other’s’ abilities, and respecting differences, including limitations and strengths.

Directors and employees are required to show respect by being compassionate, and by being considerate of the rights, dignity and well-being of all their colleagues. Directors and employees are therefore, prohibited from discriminating against fellow employees, in word or deed, on any basis, including, but not limited to, race, age, gender, language, religion, sexual orientation, or on account of a disability. All interactions must be based on mutual respect. When behaviour is unwelcome to even one person, it poisons the entire working environment.

	<b>Columbus Stainless (Pty) Ltd</b>	Document no.: LEG-PRO-001
Title: <b>Supplementary Procedure</b>		Revision: 3
Implementation Date: 04 October 2022		Page 13 of 15

Columbus will not discriminate against members of the public, suppliers, competitors, government officials, or other parties in its business dealings. Columbus will also not tolerate any form of xenophobia (fear of, and discrimination against, foreigners) and will be objective when investigating cases involving foreign nationals.

With regard to its human resources, Columbus is committed to reinforcing the principle of humane employment practices and, in particular, to:

- eliminating discrimination;
- recognising the employee's inalienable right to organise and negotiate conditions of employment; and all other labour rights;
- conducting union/organised labour and union member dealings in a respectful manner; and
- promoting equal opportunities for training and personal development.

Columbus also respects its employees' personal privacy, but it does expect them to be law-abiding and to conduct their personal affairs like good and responsible citizens, especially where any indiscreet or antisocial behaviour could affect the individual's performance or reflect badly on Columbus.

#### 14 POLICY AND PROCEDURE FOR THE DISCLOSURE OF INFORMATION

It is the duty of every employee to speak up about genuine concerns in relation to criminal activity, breaches of a legal obligation (including negligence), miscarriage of justice, danger to health and safety or the environment, whether confidential or otherwise (hereinafter referred to as a malpractice suspicion). Employees are encouraged to make use of the anonymous phone line at **X3272 (internal calls) or 013-247 3272 (external calls)** to report malpractice suspicion. Please note, however that if you call using Columbus landline, the source of the call can be identified by the Ethics committee members when they receive the transcript.

Columbus is committed to ensuring that employees concerns of this nature will be taken seriously and properly investigated.

A disclosure, made properly, will be protected if the employee has an honest and reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur. Employees who raise these reasonable concerns will not be penalized in any way.

##### Procedure

- Any employee (disclosing employee) who has a reasonable suspicion of malpractice should initially take their concerns to their line manager.
- If they do not feel that this is appropriate, they should approach another senior manager.
- If the concern is a personal grievance, the employee should follow the company grievance procedure contained in the Columbus Industrial relations policy. The employee is encouraged to approach the relevant human resources practitioner.
- Should you feel that the malpractice is of such a nature that it should be elevated to an executive level, or should the disclosing employee feel that the malpractice or grievance has



not been properly addressed, please feel free to contact the appropriate office bearer listed below

- a) General Manager: Legal and Transformation
  - b) Manager: Human Resources
  - c) Manager: Security and Investigations
  - d) Manager: Risk (safety , health and environment)
  - e) Manager: Internal audit
  - f) Anonymous voice recording Line **(013 247 3272)**
- A disclosure properly made will not necessarily absolve the disclosing employee from his/her own improper conduct. The company retains the right to take action against the disclosing employee for his improper conduct.
  - This policy is guided by the company's commitment to the Protected Disclosures Act 26 of 2000 and all subsequent amendments and revisions thereto.

## 15. PENALTY FOR TRANSGRESSIONS

The Company retains the right to make an appropriate finding in a disciplinary hearing against any employee found guilty of a violation in terms of this policy.

Notwithstanding the above, employees found guilty of malpractices which violate this policy may be dismissed in terms of the Company's disciplinary procedures and legal action will be instituted where applicable.

In the event of a conviction by the court, the relevant information will be recorded against the transgressor's personal record and details provided to prospective future employers who seek references.

Outside organizations involved in malpractices will also be removed from the Company's approved list of suppliers.

## 16. Revision history

Revision	Date	Author	Remark
0	01 January 2016	Kutala Bizana	Created



## Columbus Stainless (Pty) Ltd

Document no.:  
LEG-PRO-001

Title: **Supplementary Procedure**

Revision: 3

Implementation Date: 04 October 2022

Page 15 of 15

1	01 August 2019	Kutala Bizana	Number 5: Business courtesy limit has been increased to R2 500.00 from R1 000.00
1	01 August 2019	Kutala Bizana	Number 14: Added – Please note, however that if you call using Columbus landline, the source of the call can be identified by the Ethics committee members when they receive the transcript.
2	07 June 2021	Kutala Bizana	Changed the Chief Executive Officer's details from Lucien Matthews to Johan Strydom.
2	07 June 2021	Kutala Bizana	Updated with new company values
2	07 June 2021	Kutala Bizana	Change to template
3	05/09/2022	Kutala Bizana	Number 5 : Added - however it must still be declared on the electronic gift form

### 17. DOCUMENT APPROVAL

	Job Title	Co. No.
Prepared by	Secretary Legal	9189
Approved by	General Manager Transformation	9281
	Chief Executive Officer	5252