



## 1. INTRODUCTION

This Business Ethics Policy outlines the company values and provides the ethical standard and behavior that is required of all directors and employees of Columbus.

## 2. LIVING COLUMBUS VALUES THROUGH BUSINESS ETHICS POLICY

Columbus Business Ethics Policy reflects the organisation's commitment to the highest ethical standards and principles in all Columbus business. It not only describes the acceptable behaviour and attitudes that are essential in living Columbus values, but it also establishes the foundation for the interaction of Columbus' Board of Directors and employees with colleagues, customers, suppliers, shareholders, the environment, the public and other stakeholders.

Columbus commits itself to upholding its values and ethical standards, and demonstrating this commitment to all its stakeholders. Therefore, Columbus directors and employees are required to apply the Business Ethics Policy in their day-to-day activities, especially if there are no rules governing decisions.

Adhering to this Business Ethics Policy is not optional; it is the way we do business at Columbus. This way, we will be role models for each other, and Columbus, in turn, will be a role model amongst its peers.

The Business Ethics Policy should be read together with other policies and legislation. Any contravention of the policy will result in disciplinary action, which is transparent, just and equal for all.

Should you become aware of any unethical behaviour or non-compliance with this policy, it is your duty to address it and/or report it. Columbus will protect employees, who have reported suspected violations of the policy, against any form of victimisation or occupational detriment, and will make every effort to protect the confidentiality of anyone reporting a breach of the policy.

Together, we will build an ethical Columbus.

We at Columbus commit to the following values:

- 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

## 3. Definitions

**Business Ethics Policy:** Business Ethics Policy is similar to an agreement on the standards for behaviour, which should be applied in the workplace. It highlights the ethical values, such as respect, honesty, compassion, etc. that explains what behaviour is good and right in the workplace. It sets the standard of behaviour within the organisation, and guides employees in making ethical decisions.



**Director(s):** *director* means a member of the board of Columbus, or an alternate director of such board or a person who is a member of a committee of the board or of the audit committee, irrespective of whether or not the person is also a member of such board.

**Employees:** also referred to as staff members. These include individuals employed by the Columbus on a permanent basis, contract labour, temporary employees, part-time employees, casual employees, occasional employees, learners and others acting for Columbus.

**Columbus:** Columbus means Columbus Stainless (Pty) Ltd.

**Ethics:** ethics refers to the process of distinguishing between what is right and wrong in my interaction with others, so that one can do what is right. Doing what is right, is also interpreted as doing what is good, or ensuring that one does not do no harm.

**Stakeholders:** broadly defined, stakeholders 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's stakeholders include its shareholder, its Board of Directors, its employees, its customers, its suppliers, the public, the environment and the communities in which it operates.

**Supplementary Procedure:** this document provides additional information and regulations about Columbus's Business Ethics Policy, its core values and the ethical behaviour that is expected from all directors and employees.

**Suppliers:** 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 core beliefs, which define what one believes in and what is important. Values influence behaviour and motivate decisions. Values do not only apply to individuals but also to organisations.

### 3. Roles and Responsibilities

#### *MANAGERIAL RESPONSIBILITIES:*

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

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 Business Ethics Policy;
- c) identify ethics risks in their business activities, and establish ways of mitigating these risks, and address potential contraventions of the Business Ethics Policy;
- d) take appropriate action to correct behavioural deviations, and
- e) enforce disciplinary action when appropriate.

Managers and supervisors are required to ensure that their staff members, including temporary employees and contract workers in the department:

- a) are in possession of the Business Ethics Policy,



- b) are sensitised to the Policy, 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.

Managers and supervisors are accountable for ensuring that all new employees and temporary or contract workers attend induction programme, as well as formal ethics training workshops. The Legal Department should be contacted to provide ad hoc ethics training on request.

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” is a standing agenda item for staff meetings, so as to encourage ethics dialogue.

Managers and supervisors are required to assist staff members in:

- a) addressing ethics issues and concerns, and/or
- b) reporting unethical behaviour and violations of the law and policies, so that incidences can be investigated and appropriate action be taken.

Managers and supervisors may not, under any circumstances, victimise staff members who report unethical behaviour, and/or violations of the law and policies.

#### OTHER ROLE PLAYERS' RESPONSIBILITIES:

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 acting on behalf of 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 (*as defined in this document*) receive the Business Ethics Policy brochure as part of the contract documentation received from Columbus. The Supplementary Procedure should be made available on request.

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

Apart from employee commitment to ethical behaviour, and the role that managers and supervisors play in instilling an ethical culture through ethics awareness, communication, training and disciplinary action for non-compliance, the functions mentioned below are responsible for further entrenching an ethical culture within the organisation.

**Internal Audit** by providing an assurance function that the respective departments are complying with legislation, policies and procedures of the organisation, and that the organisational values and Business Ethics Policy are lived within the workplace. Internal Audit also serves an oversight function by monitoring ethics training and awareness.

**Ethics Committee** by investigating and reporting on ethics matters referred to them, and ensuring that disciplinary action is instituted against employees where evidence of non-compliance exists. Ethics Committee is also accountable for the confidential, externally managed, Whistleblowing line Tel: +27 1059 01101 - PIN 4591, the investigation of incidents reported to them through various channels, and for maintaining accurate statistics on crime and irregularities within the organisation, and reporting these to Exec and the Columbus Board.

**Employee Relations** by ensuring that grievances are effectively addressed, and disciplinary action is taken against employees in terms of Columbus's Disciplinary Code.



**EMPLOYEE RESPONSIBILITIES:**

Columbus is committed to the highest ethical standards and principles in all Columbus business, and requires the same from Columbus employees (*as defined*) in fulfilling their Columbus responsibilities. Compliance with Columbus’ Business Ethics Policy, Supplementary Procedure and ethics-related policies is therefore required of all Columbus employees, which include contract labour, temporary employees, part-time employees, learners and others acting for Columbus.

Employees should ensure that they are familiar with Columbus’s Business Ethics Policy, Supplementary Procedure and ethics-related policies, and that they receive proper training on these.

Employees should use the Business Ethics Policy to guide their decisions, especially when they are in doubt, or if there are no rules or policies that address the specific situation.

Employees should 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.

Employees should use appropriate channels to report unethical behaviour, crime, irregularities and grievances. Columbus will protect employees, who have reported suspected illegal activities and violations of the Policy, against any form of victimisation or occupational detriment, and will make every effort to protect the confidentiality of anyone reporting a breach.

**4. Process of Monitoring**

The Business Ethics Policy falls under the responsibility of the Ethics Officer in the Legal Department. The Ethics Officer’s role is to regularly review the Business Ethics Policy and to assist the organisation with the effective implementation thereof.

General Managers are accountable for compliance with the Business Ethics Policy within their respective Departments.

**5. Contact Details**

Should you have any query regarding the subject matter or wish to obtain a copy of the latest version of this policy, please do not hesitate to contact Columbus Legal Department: Office number 14, C Block tel - 013 247 2206, email - [legal@columbus.co.za](mailto:legal@columbus.co.za), Hotline to Whistleblowing Tel: +27 1059 01101 - PIN 4591.

**Revision history**

Revision	Remark
0	Created
1	Changed the Chief Executive Officer’s details from Lucien Matthews to Johan Strydom.
1	Updated with new company values
1	change to template
2	Hotline to Whistleblowing Tel: +27 1059 01101 - PIN 4591
2	Changed Chief Executive Officer to Chief Operating Officer
2	Changed title from Legal and Transformation to ESG and Legal



Columbus Stainless (Pty) Ltd

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## 6. Document Approval

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Prepared by	Secretary: Legal	9189
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