

# Stefanutti Stocks (Pty) Ltd

## Ethics Policy Statement



Stefanutti Stocks ("the group") is committed to operate all its activities within the spirit and letter of all laws affecting its business and staff members. All employees must exercise the highest level of integrity, ethics and objectivity in actions and relationships which may affect the group or where the employee represents or negotiates on behalf of the group. Employees must not misuse the authority or influence of their positions in these relationships.

It always has been and continues to be the intent of the group that its employees maintain the highest ethical standards in their conduct of the group's affairs. The following sets forth the group's long-standing code with respect to: \* gifts, favours, entertainment, and payments given or received; \* potential conflicts of interest; \* potential anti-competitive behaviour; and \* certain other matters.

This code is regularly communicated. Appropriate communications will also be made to others outside the group who may transact business with the group. These policies may be supplemented from time to time by more specific guidelines.

Stefanutti Stocks is committed to the principles of free and fair competition. The Group's policy is to compete vigorously and effectively while always complying with applicable competition laws and regulations. Compliance with this policy is a matter of the highest priority for Stefanutti Stocks.

Employees should never enter into any agreement, arrangement, understanding or discussion with any of our competitors in respect of any of the following: \* Pricing \* Market Sharing or Allocation \* Information Sharing \* Collective boycotts.

No other matters, discussion or behaviours should occur which may be construed as being in anyway anticompetitive or collusive in nature.

To ensure the highest level of objectivity in dealing with its vendors, suppliers, contractors and agencies, employees shall not solicit, request, or accept any gratuity, kickback, free services or special favours from vendors, agencies, suppliers, or contractors of the group that would, in any way, place the group or the vendor in an uncomfortable or compromising position.

Entertainment and/or gifts for any shareholders, associates, customers, members of the Board and/or any other persons dealing/associated with group activities, should always be in good taste, modest and should not be of a character or amount which is intended to influence the individual from making an independent decision.

The group encourages individual employees to be active participants in public affairs, and to support the political parties, candidates, advocacy organizations, affiliations, and charities of their choice.

Under no circumstance should any personal involvement in such activities result in any material impact on any group business activity function, nor indicate any relationship to, representation of, or support of the group.

  
Russell Crawford  
Chief Executive Officer  
Revised: 01/07/2022