

Stefanutti Stocks (Pty) Ltd

Code of Business Ethics and Conduct (Website Policy Statement)



At Stefanutti Stocks, we are committed to conducting our business with integrity, professionalism, and the highest ethical standards. Our Code of Business Ethics and Conduct outlines the principles that guide our actions and decisions, both internally and in all our interactions with external stakeholders.

Key Principles of Our Code:

- **Integrity and Compliance:**
We conduct our business honestly and ethically, in full compliance with all applicable laws and regulations. Our employees are expected to act with integrity in all business dealings and decision-making processes.
- **Fair Competition:**
We compete fairly and vigorously while adhering to all relevant competition laws. We prohibit any form of anti-competitive behavior, including price-fixing, market-sharing, or improper information sharing with competitors.
- **Conflict of Interest Management:**
All employees must avoid situations where personal interests conflict—or appear to conflict—with the interests of the Group. Full disclosure and prior approval are required for any external business interests or relationships that could present a conflict.
- **Gifts, Entertainment, and Favors:**
We apply strict guidelines to accepting or giving gifts, entertainment, or favors. Cash gifts are strictly prohibited. Any non-cash gifts above defined thresholds must be disclosed and approved in line with our policy.
- **Confidentiality:**
Employees must protect confidential and proprietary information entrusted to them and refrain from disclosing it to any third party, both during and after their employment.
- **Political and External Activities:**
We respect employees' rights to engage in personal political or charitable activities, provided these do not conflict with their responsibilities or imply Group endorsement.
- **Reporting and Accountability:**
We encourage employees to report suspected unethical conduct. All concerns will be addressed with confidentiality and in accordance with our internal investigation and disciplinary processes.

A detailed policy is available on the Company Portal.



Russell Crawford
Chief Executive Officer
Revised: 01/07/2025