

Supplier Code of Conduct

AlcoNCP takes pride in its success and reputation. This reputation has taken many years to build and maintaining it is crucial. This Supplier Code of Conduct (the “Code”) has been developed to declare what AlcoNCP regards as morally or ethically acceptable behaviour from current and future vendors, suppliers, contractors, consultants, agents and other providers of goods and services (our “Suppliers”) and sets out the ethical values, standards, principles, and guidelines which Suppliers need to abide by, in their dealings with AlcoNCP.

AlcoNCP is committed to ensuring that working conditions within the supply chain is safe and that employees are treated with respect and dignity. AlcoNCP is also committed to ensuring that processes related to its supply, manufacturing and distribution operations are conducted in an environmentally and socially responsible manner.

Suppliers and business partners are required to operate in accordance with AlcoNCP’s values and in full compliance with the applicable laws, rules, and regulations of their respective countries. AlcoNCP regards any contravention of this Code as a serious matter which could result in the termination of the business relationship and even possibly the institution of civil or criminal proceedings. Any deviations from this Code will only be allowed if permission is received in writing from AlcoNCP’s Procurement Manager.

Suppliers are required to take steps to ensure that the Code is communicated throughout their organisations. AlcoNCP requires suppliers to share its commitment to and compliance with the following minimum standards:

1. LABOUR

1.1 Human Rights Discrimination

Suppliers must uphold the human rights of their employees and treat them with dignity and respect. Every Supplier must take steps to promote equal opportunity in the workplace by eliminating unfair

discrimination in employment policies and practices. Suppliers may not unfairly discriminate, directly or indirectly, against an employee, in any employment policy or practice, on one or more grounds including race, colour, age, gender, sexual orientation, ethnicity, disability, religion, pregnancy, political affiliation, union membership, national origin, HIV status or marital status.

Suppliers may not require employees or potential employees to undergo medical tests that could be used in a discriminatory manner unless required by applicable legislation.

1.2 Harassment and Forced Labour

Suppliers must be committed to a workplace that is free of any harassment. Suppliers may not threaten employees with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse. Suppliers and their employees may not engage in any form of physical or mental abuse, harassment, punishment, or the threat thereof against any person. No Supplier may, for its own benefit or for the benefit of someone else, cause, demand or impose forced labour. Any form of involuntary, bonded, indentured, or prison labour is strictly prohibited.

1.3 Child Labour

No Supplier may employ a child younger than minimum legal working age. All Suppliers must comply with the applicable child labour legislation in their respective countries.

1.4 Wages and hours of work

Suppliers must set working hours, wages, overtime pay and annual leave in accordance with the applicable laws in their respective



countries. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. Working conditions shall be humane. Overtime work must be on a voluntary basis. Workers must not be required to work more than the regular hours and overtime than permitted by law in the country where the workers are employed.

1.5 Freedom of Association

Every employee has the right to freedom of association. This includes the right of an employee to join and form a trade union, to participate in activities of a trade union and to engage in collective bargaining in accordance with the procedures prescribed by applicable legislation.

2. HEALTH & SAFETY

AlcoNCP recognises that sound health and safety management practices in all aspects of the business is essential to maintain morale and produce high quality products. Suppliers must therefore commit to creating a safe and healthy work environment for all employees. All Suppliers must comply with the provisions of any local health and safety legislation applicable to their specific industry and country.

2.1 Occupational Safety and Industrial Hygiene

Suppliers must provide appropriate controls, safe work procedures, preventative maintenance, and protective measures to mitigate health and safety risks within the workplace. If hazards cannot be adequately controlled by these means, suppliers must provide their employees with appropriate personal protective equipment. Suppliers must further identify, evaluate, and control exposure to its employees of any hazardous chemical, biological or physical agents. If hazards cannot be adequately controlled by means of engineering, then Suppliers must provide employees with appropriate personal protective equipment.

2.2 Emergency Prevention and response procedures

Suppliers must anticipate, identify and assess emergency situations and events and minimize its impact by implementing emergency plans and response procedures. This includes emergency reporting, employee notification, evacuation procedures, training and drills, first-aid supplies, applicable fire detection and suppression equipment, adequate exit facilities and recovery plans.

2.3 Occupational Injury and Illness, Physically Demanding Work and Communication

Suppliers must establish procedures and systems to manage, track



and report occupational injuries and illness. Suppliers must furthermore identify, evaluate and control worker exposure to physically demanding tasks, including manual handling of materials, heavy lifting, prolonged standing, and highly repetitive or strong assembly tasks. Suppliers must also ensure that its employees receive adequate information and training pertaining to health and safety in the workplace, including written information and



warnings. Suppliers must also initiate and support employee health and safety committees to enhance health and provide safety education.

3. COMPETITIVE LAW

Competition laws ensure that companies compete to acquire business by offering lower prices, innovative products and better service and not by interfering with the market forces of supply and demand. ALCONCP requires that all suppliers conduct their business in full compliance with all applicable laws intended to promote free and fair competition and do not enter into prohibited agreements or practices, formal or informal, such as price fixing, market sharing, bid rigging, collusion and “kickbacks”.

4. CONFIDENTIAL AND PROPRIETARY INFORMATION

Suppliers may not use, for their own purposes or disclose to any third party ALCONCP intellectual property, trade secrets or other confidential, proprietary or sensitive information, without the prior written consent of ALCONCP. The Supplier shall disclose ALCONCP Information to persons within the Supplier organization strictly on a “need to know” or “need to use” basis.

5. COMPLIANCE AND ETHICS

AlcoNCP endeavours to do business with Suppliers honestly and ethically and will give all potential suppliers fair consideration. Decisions will be based on objective criteria such as price, quality, B-BBEE status, service capability, reliability and integrity. Suppliers are required to demonstrate the same high ethical standards and to conduct business with integrity and fairness. Knowledge gained through association with AlcoNCP may not be used for private or personal advantage or in such a manner that a conflict or an appearance of conflict arises between the company’s interest and the Suppliers interest.



Any form of nepotism or preferential treatment involving family or friend / associate represents an acceptable conflict must be avoided. To this end ALCONCP employees are prohibited from transacting with any company for personal gain.

5.1 Compliance and Documentation

AlcoNCP monitors compliance with employment, safety, quality and environmental standards. Suppliers must manufacture, package, store and transport products in accordance with good manufacturing practices prevailing in their respective industries and countries. Suppliers are expected to provide goods and services that consistently meet the required specifications and/or industry standards. Suppliers are required to agree to at least one annual on-site inspection of the workplace and other related areas that will be conducted by AlcoNCP representatives, or an AlcoNCP designated independent third party. For AlcoNCP to monitor compliance, Suppliers are required to keep compliance records in accordance with the applicable local and international standards.

5.2 Corruption, Extortion or Embezzlement

Extortion and embezzlement, in any form, are strictly prohibited and may result in immediate termination of the business relationship between AlcoNCP and the Supplier. Legal action may also be instituted. All business and commercial dealings must be transparently performed and accurately recorded in the Suppliers records.

5.3 Disclosure of Information

Suppliers must disclose information regarding its business activities, structure and/or financial situation in accordance with applicable laws, regulations, and prevailing industry practices. Suppliers shall further declare any AlcoNCP employees; AlcoNCP employees' family or AlcoNCP employee

friends interests in its business.

5.4 Anti-Bribery

Company policy and anti-bribery laws around the world prohibit AlcoNCP and its employees from giving or accepting money or other inappropriate enticements, directly or indirectly to coerce or persuade the awarding of a business opportunity to AlcoNCP or the Supplier, as the case may be. Suppliers may not, in their business relationship with AlcoNCP, act in any way, that violates AlcoNCP policy or anti-bribery laws around the world. Suppliers must also ensure that where AlcoNCP is involved in the supply chain that their suppliers do not engage in the giving or receiving of bribes, kickbacks, or other similar improper or unlawful payments.

Ethical standards form an integral part of all AlcoNCP strategies and operations. Suppliers are therefore required to commit to the highest standards of ethical conduct when dealing with all stakeholders and to conduct business with integrity and fairness.

5.5 Protected disclosures

Suppliers must make provision for employees to report unlawful or irregular conduct by employers and fellow employees while ensuring the protection of those employees who make the disclosures. Suppliers must create a culture facilitating the disclosure of information by employees relating to criminal and other irregular conduct in the workplace in a responsible manner and also promote the eradication of criminal and other irregular conduct.

5.6 Conflict of Interest

Suppliers are obligated to disclose any interest and/or relationship that could potentially give rise to a conflict of interest, as and when they arise.

6. GIFTS AND HOSPITALITY

Suppliers should be aware that even though it is permissible for AlcoNCP 's employees to receive gifts, in accordance with the conditions laid out herein, it is not advisable for AlcoNCP employees to give or receive gifts, hospitality or favours that could influence any business decision or that create the appearance of influencing such decisions. Suppliers can therefore only provide gifts, hospitality or favours to any AlcoNCP employee, their family members or friends as follows:

- 6.1 Promotional material and reasonable business entertainment such as business breakfasts, lunches, cocktail parties or dinners;
- 6.2 Business conferences and/or seminars;

Acceptances of gifts, vouchers or any others must be approved by the AlcoNCP employees Head of Department. Any deviations from this will only be allowed with the express permission of an AlcoNCP Executive.

7. SUSTAINABILITY

AlcoNCP is committed to the principle of sustainable development, by striking an optimal balance between economic, environmental and social development and will strive to innovate and adopt best practice, working in consultation with its stakeholders. AlcoNCP recognizes the need for sustainability to:

- a) Minimize consumption of natural resources and waste generation;
- b) Minimize the impact of operations on the environment; and
- c) Maximize recycling where possible.

and requires Suppliers to share its commitment to Sustainability. Therefore, operations, sourcing, manufacture, distribution of products and the supply of services must be conducted with the aim of protecting



and preserving the environment.

7.1 Community Engagement

Suppliers are encouraged to engage with their community to help foster sustainable communities and socio-economic development. All Suppliers should ensure that their business works in partnership with relevant stakeholders for the overall benefit of the society.

8. **BREACH**

In the event a Supplier violates this Code, AlcoNCP reserves the right, in its sole discretion, to terminate its business relationship with the Supplier. Alternatively, AlcoNCP may request the Supplier to implement immediate corrective measures. All Suppliers and employees of AlcoNCP should report any conduct that is inconsistent with the principles of the Code.

AlcoNCP will ensure that safe and effectively managed processes are in place for employees and suppliers to report unethical conduct. Suppliers may elect to contact the Company's Risk and Compliance Manager or to provide such information via email on info@alconcp.com.