

SUPPLIER CODE OF ETHICS

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Clicks Group Limited and all its subsidiaries and divisions ("the Group") is committed to conducting business honestly, openly and with integrity and in accordance with the highest ethical standards.

This Supplier Code of Ethics ("the Code") has been developed to ensure that the Group's values and ethical standards are clearly articulated to and supported by its Suppliers and other stakeholders. The Code determines the ethical values, standards, principles and guidelines which bind our Suppliers in all their dealings with the Group ("Suppliers"). The Group is committed to ensuring that working conditions within the supply chain are safe and that employees are treated with the necessary respect and dignity. The Group is furthermore committed to ensuring that all manufacturing processes are environmentally and socially responsible. Suppliers and business partners are required at all times to operate in accordance with the Group's values and are obligated, in all of their activities, to operate in full compliance with the applicable laws, rules, and regulations of their respective countries.

The Group views all its Suppliers as business partners and undertakes to ensure that a good working relationship is maintained based on ethical and fair values. To ensure this all Suppliers are expected to comply with the following basic principles:

1. Labour

1.1 Human Rights Discrimination

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

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 & Forced Labour

Suppliers must be committed to a workplace that is free of 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 who has not attained the applicable minimum legal working age. All Suppliers must comply with the applicable child labour legislation in their respective countries.

1.4 Wages & Hours

Suppliers must set working hours, wages, overtime pay and annual leave in compliance 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. While it is understood that overtime is often required in production, Suppliers shall carry out operations in such a way that limits overtime to a level that ensures humane and productive working conditions

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 the applicable laws.

2. Health & Safety

The Group acknowledges that integrating sound health and safety management practices into all aspects of the business is essential to maintaining high morale and producing innovative products. Suppliers must commit to creating a safe and healthy work environment for all employees. All Suppliers are expected to comply with the provisions of any local health and safety legislation applicable to their specific industry and country.

2.1 Occupational Safety & 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 furthermore 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, Suppliers must provide employees with appropriate personal protective equipment.

2.2 Emergency Prevention & Response Procedures

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

2.3 Occupational Injury and Illness, Physically Demanding Work & 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 forceful assembly tasks.

Suppliers must also ensure that its employees receive adequate information and training pertaining to health and safety in the work place, including written information and warnings in the primary language of the employees. Suppliers are furthermore encouraged to initiate and support employee health and safety committees to enhance health and safety education.

3. Broad-Based Black Economic Empowerment (“B-BBEE”)

South African suppliers are required to commit to the principles of B-BBEE as set out in the Department of Trade and Industries’ Codes of Good Practice on Black Economic Empowerment and will be required to provide the Group with a scorecard, in accordance with the Codes of Good Practice on Black Economic Empowerment published in the Government Gazette on 9 February 2007 (as amended from time to time), on an annual basis.

4. The Environment

Suppliers are required to implement and maintain environmental policies to ensure that their operations are conducted in an environmentally responsible way and be transparent about and accountable for their environmental performance. In so doing, suppliers are obligated to comply with the environmental standards, laws and regulations applicable to their respective industries and countries.

Suppliers are encouraged to reduce energy, carbon emissions, water and waste to prevent unnecessary impacts on biodiversity, pollution and resource use.

The Code aims to ensure that Suppliers take proactive steps to systematically reduce and remove environmental impacts and prevents degradation, thereby contributing to the building of a sustainable society and environment.

5. Compliance and Ethics

Ethical standards form an integral part of all the Group’s 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.

5.1 Compliance and Documentation

The Group 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 a representative of the Group or designated independent third party. In order for the Group 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

Corruption, extortion and embezzlement, in any form, are strictly prohibited and may result in immediate termination of the business relationship between the Group and the supplier and/or legal action.

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. All suppliers shall ensure that confidential and sensitive business and employee information disclosed by the Group to the Supplier, in any form, is not disclosed to any third party without the Group's consent.

5.4 Anti-bribery

Company policy and anti-bribery legislation prohibits the Group and its employees from giving or accepting money or any other inappropriate enticements in an attempt to induce any person to award a business opportunity to the Group or to a supplier, as the case may be. Suppliers may accordingly not act in a manner that violates Group policy or anti-bribery legislation. In so doing, Suppliers must ensure that they do not engage in the giving or receiving of bribes, kickbacks, or other similar improper or unlawful payments.

5.5 Whistle-blowers

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 in both the public and private sectors.

5.6 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.

5.7 Conflict of Interest & Gifts

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.

In the event that a Supplier wishes to provide gifts and/or favours (whether financial or otherwise) to the Group or any of its employees or representatives, the Supplier shall do so in full compliance with the Group's gift policy, a copy of which will be provided to the Supplier by the Group's compliance department upon request.

5.8 Breach

If a Supplier violates the Code the Group reserves the right, in its sole discretion, to terminate its business relationship with the Supplier. Alternatively, the Group may request the Supplier to implement immediate corrective measures.

All Suppliers and employees of the Group should report any conduct that is inconsistent with the letter and spirit of the Code. The Group 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 Group Compliance Officer or to provide such information on an anonymous basis via the Group's tip-off line at **0800 024 365**.

This method of reporting was created to ensure that all Suppliers and employees of the Group have a confidential and safe forum to report suspected instances of unethical conduct.