

Business Ethics Policy Statement

MAY 2023

Business Ethics Policy Statement.

SANWA expects and demands that all Directors, Managers and staff of the Company will conduct their business and perform the duties assigned to them to the highest ethical standards, and in compliance with all legal principles and regulations that apply. This standard of behaviour and performance will be maintained in the Companies interactions and dealings with clients, suppliers and all other companies or individuals that interact with SANWA.

General Principles

The company and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The company will conduct its business in a competent, fair, impartial, and efficient manner.

Health and Safety

The company is committed to providing a safe and healthy working environment for all of its employees both on and off its sites. The company applies the health and safety principles and standards to all visitors.

Environment

The company respects the environment and the need to protect it and minimise the impact its operations have on it

Employees

All employees are treated with dignity and respect, and with equal employment and promotion opportunities given to all, irrespective of their race, religion, gender, sexual orientation, marital status, family status, disability, age, or national origin. Employees are offered a safe and healthy workplace and the company does not tolerate any form of harassment.

Clients

The company will take all reasonable care to avoid misleading statements, concealment, and overstatement in any and all of its public statements. SANWA will seek to build long term partnerships with its clients by being honest and straightforward in its dealings at all times, and will respect the confidentiality of any information it may obtain in relation to its clients.

Suppliers

Suppliers will be chosen on the basis of all factors, including price, quality, availability, delivery, service, and integrity. The company's choice of suppliers will be made objectively. Honesty and openness will be paramount in the company's dealings with its suppliers.

Competitors

The company has built its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

Government, Regulators, and Legislators

The company will seek to comply with all international, national, and local legislation that may have an effect on its operations. It will strive to follow the best practice in corporate governance, and will meet its tax obligations.

Giving and Receiving Gifts and Entertainment

Employees will neither seek nor accept for themselves or others any gifts, favours, or entertainment without a legitimate purpose from any person or business organisation that does or seeks to do business with, or is a competitor of SANWA. Gifts, favours, and entertainment may be given to others at the expense of the company as long as these are consistent with customary business practice and are not excessive in value.

Bribes and Corrupt Practice

The company does not allow or condone the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. The company has a separate Bribery Policy in place which examines in detail the procedures all employees must follow to avoid involvement in any situation which might lead to the offer of bribes. The policy makes it clear that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution.