

ANTI-BRIBERY & CORRUPTION (ABC) Policy	
Effective Date: 01 August 2025 Document number:02	FFS REFINERS (PTY) LTD and its SUBSIDIARIES

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially and ethically responsible manner.

2. Policy Statement

- 2.1. Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- 2.2. It is our policy to conduct all our business in a honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 2.3. We will uphold all laws relevant to countering bribery and corruption and are aware that bribery and corruption offences are punishable with imprisonment and / or fines.
- 2.4. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

3.1. Who is covered by the policy?

- 3.1.1. This policy applies to all staff irrespective of level or grade, including managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff and agents.
- 3.1.2. In this policy, third party means any individual or organisation you come into contact with during the course of your work and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- 3.1.3. This policy covers:
 - 3.1.3.1. Bribes;
 - 3.1.3.2. Gifts and hospitality;
 - 3.1.3.3. Facilitation payments;
 - 3.1.3.4. Political contributions;
 - 3.1.3.5. Charitable contributions

Owner: Legal Officer	Approver: Corporate Affairs Officer
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3.2. Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe any public or government official.

3.3. Gifts and hospitality

3.3.1. Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper or which violates this policy or the Company's Code of Conduct.

3.3.2. Employees may not accept any gift or hospitality from our business partners if:

3.3.2.1. it exceeds R500 in value for each individual gift or hospitality event (not to exceed a total of R1000 in any financial year), unless approved in writing by the employee's manager; or

3.3.2.2. it is in cash; or

3.3.2.3. There is any suggestion that a return favour will be expected or implied.

3.3.3. We appreciate that the practice of giving business gifts varies and may be considered acceptable in some circumstances. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable and the intention behind the gift should always be clear and unambiguous.

3.3.4. Where this policy requires written approval to be given, the Company shall put in place a process to maintain a register of all such approvals.

3.4. Facilitation payments and kickbacks

3.4.1. Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official of routine governmental action.

3.4.2. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to. Our strict policy is that facilitation payments must not be paid.

3.4.3. FFS adopts a strict zero-tolerance approach to bribery and corruption. Employees must not, under any circumstances, offer, give, request, or accept bribes, facilitation payments or any other improper advantage, whether directly or indirectly. If an employee is confronted with such a situation, he or she must not make any payments and immediately contact the Chief Executive Officer.

3.5. Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6. Charitable contributions

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- 3.6.1. charitable support and donations are acceptable (and indeed are encouraged), whether in kind services, time or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.
- 3.6.2. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Corporate Affairs Officer and all charitable contributions should be publicly disclosed.

4. Your Responsibilities

- 4.1. You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.
- 4.2. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify the company or the confidential whistleblowers line as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.
- 4.3. Any employee who breaches this policy will face disciplinary action, which could result in dismissal. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5. What To Do If You Are a Victim of Bribery or Corruption

- 5.1. It is important that you inform the company or the confidential whistleblowers line as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.
- 5.2. In informing as per above, you are encouraged to give as much detail as you can in order that the Company can fully investigate the matter and, if required, take the necessary corrective action.

6. Protection

- 6.1. Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions.
- 6.2. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 6.3. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

7. Our Commitment

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- 7.1. All employees will be asked to formally indicate their acceptance of, and conformance to, this policy on an annual basis.
- 7.2. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

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