

Dear Valued Partner,

## SPIER'S ETHICAL CODE OF CONDUCT

At Spier, we take our responsibility to do business in a fair and sustainable way very seriously. In order to ensure that our employees, management, visitors, sub-contractors, contractors' suppliers, labour service providers or partners and stakeholders share this vision and are fully informed about our working standards, we've created the **Spier Supplier Code of Conduct**.

Above all, we endeavour to run our business in a way that:

- respects, values and develops people;
- conserves the environment and our natural resources;
- engages and contributes positively to local communities.

Many of the principles in the Code are about complying with the current laws and regulations. While we expect, at a minimum, compliance with these laws, we also aim to work together in an open and transparent manner in order to achieve meaningful, positive change in people's lives.

A full transcript of the Spier Ethical Code of Conduct is available on request. It is summarised in the **Condensed Spier Ethical Code of Conduct** and seeks to outline the principles that we believe are consistent with trading ethically and ensuring that our business continues to operate responsibly and sustainably.

Best regards,

Frans Smit  
Managing Director

## Spier's Ethical Code of Conduct

Suppliers contracted to provide products and services to Spier will ensure that a management system is in place to adopt and implement this code. This includes appointing an accountable responsible senior manager.

### 1. HUMAN RIGHTS

The importance of respecting and upholding the freedoms and rights under law will be recognised. All people are entitled to these rights, irrespective of status and background.

### 2. LABOUR STANDARDS:

#### A. Modern Slavery and Forced, Bonded and Indentured Labour Employment

Forced, bonded, trafficked, or involuntary labour may not be used.

#### B. Freedom of Association and the right to Collective Bargaining

We will respect the rights of employees to form and join trade unions or other kinds of workers' associations of their choosing, and to engage in collective bargaining without harassment, interference, or retaliation.

#### C. Child Labour and Young Employees

A system will be established to ensure that no child labour is used below the legal minimum age. Special protection will be supplied to employees that are not yet adults.

#### D. Fair Remuneration and Benefits

Wages and benefits for a standard working week will meet, or exceed, national legal and industry benchmark standards. Wages should be enough to cover basic needs and provide some discretionary income.

#### E. Working Hours

Working hours must not exceed 45 hours for an ordinary week, except where permitted by law. Overtime will be voluntary, not exceed the maximum hours permitted and paid at a premium rate and in accordance with the law.

#### F. Information Regarding Employment

Workers to hold understandable copies of employment contracts, payslips and any information relevant to their employment including benefits, policies and procedures.

#### G. Leave Entitlement

All workers will receive, at least, all various leave and other legally mandated benefits to which they are entitled.

#### H. Employment Equity and Non-Discrimination

Equal opportunities will be provided to all with no discrimination when hiring or promoting employees.

#### I. Regular Employment and Entitlement to Work

Obligations to workers under labour or social security laws and regulations arising from a regular employment relationship will not be avoided through the use of labour-only contracting, sub-contracting or excessive use of fixed-term contracts of employment.

#### J. Responsible Recruitment

Effective monitoring and hiring of foreigners, temporary and seasonal staff

#### K. Labour Providers

Ensure legal and ethical compliance of temporary labour contractors.

#### L. Subcontracting and Home Working

Transparency and compliance of subcontractors within the supply chain is required.

#### M. Discipline and Harassment

There will be no physical or mental abuse or the threat thereof. Racial, sexual or any other form of harassment is forbidden. All disciplinary measures will be recorded.

## **N. Fair Treatment**

Victimisation, harassment, abuse and bullying is prohibited. Workers to be treated with dignity and respect.

## **O. Grievance Mechanisms**

Grievance mechanisms must be effective and recorded.

## **P. Employee Involvement and Protection**

Employee rights must be protected, and employees must be kept informed about their rights and responsibilities.

## **3. WORKPLACE HEALTH AND SAFETY**

A safe and hygienic workplace will be provided. Risks will be assessed and the necessary steps to eliminate and reduce these will be taken.

## **4. EMPLOYEE WELFARE**

Workplace hygiene, sanitation and safety standards to be introduced. Including for pregnant women and young parents. Responsible alcohol production and consumption, and substance misuse.

## **5. ENVIRONMENTAL STEWARDSHIP**

Reasonable measures to mitigate negative operational impacts on the environment will be adopted and continuous improvement in environmental performance will be striven for.

## **OPEN AND TRANSPARENT APPROACH**

At Spier, we encourage openness and transparency in our relationships with our suppliers. Our desire is to work together to improve our sustainability performance, and we are committed to help suppliers wherever we can. Should a supplier breach our code of conduct, we will try to work with them to improve standards, but we reserve the right to terminate our partnership where there is unwillingness to make the necessary changes.

## **6. BUSINESS ETHICS AND INTEGRITY**

The highest standards of integrity, transparency and governance will be upheld. As a minimum, all relevant legislation will be complied with.

## **7. ADHERENCE TO LAND USE RIGHTS (IF APPLICABLE)**

Suppliers will ensure that any and all land used in the production of its products has been obtained lawfully, used without restriction and is compliant with all relevant local laws and regulations.

## **8. PROTECTION OF PERSONAL INFORMATION**

Comply with POPI Act requirements.

## **9. REPORTING VIOLATIONS**

The Whistle Blower Procedure - Suppliers must not take part in any form of bribery, extortion, embezzlement, or corruption. Report abuse to confidential hotline: **0800001873** or **spierwine@whistleblowing.co.za**

## **10. AWARENESS BUILDING**

On-going awareness and training on ethical policies to workers, management, contractors and suppliers.