



Supplier Code of Conduct

Nampak takes enormous pride in its reputation for integrity and the success that its reputation enables. This reputation has taken years to build and maintaining it is vital to our success.

This Supplier Code of Conduct (the "Code") has been developed to publically declare what Nampak 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 bind Suppliers in their dealings with Nampak.

Suppliers are required to take steps to ensure that the Code is communicated throughout their organizations.

Nampak 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. Accordingly, deviations from the Code will only be accepted if acceptance or permission in writing is granted by a member of the Executive committee responsible for the operation in question.

Nampak requires Suppliers to share its commitment to and compliance with the following minimum standards:

1. Competition 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.

Nampak 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 "kick backs".

2. Confidential and Proprietary Information

Suppliers may not use for their own purposes or disclose to any third party Nampak's intellectual property, trade secrets or other confidential, proprietary or sensitive information ("Nampak Information") without the prior written consent of Nampak.

The Supplier shall disclose Nampak Information to persons within the Supplier organization strictly on a "need to know" or "need to use" basis.

3. Ethical Dealings

Nampak seeks to deal with Suppliers honestly and ethically and will give all potential suppliers fair consideration. Decisions will be based on objective criteria such as price, quality, BBBEE status, service capability, reliability and integrity.

The giving or receiving any kickbacks, bribes or similar payments of any sort is prohibited. Nampak employees may not receive any commissions, money or item of value other than regular remuneration and incentives as provided in their terms of employment, either directly or indirectly, for negotiating, procuring, recommending or aiding in any transaction entered into on behalf of Nampak, nor are they entitled to any direct or indirect financial interest in such transactions.

Suppliers are required to demonstrate the same high ethical standards and to conduct business with integrity and fairness.

Nampak employees are prohibited from engaging in any private financial relationship with any Supplier, its owners, shareholders, directors, partners or members including the investment in or acquisition of any financial interest for their own account in any Supplier business, or with any of the owners, shareholders, directors, partners or members of such business, other than ordinary share dealings through a recognised stock exchange.

4. Anti-Bribery

Company policy and anti-bribery laws around the world prohibit Nampak 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 Nampak or the Supplier, as the case may be.

Suppliers may not, in their business relationship with Nampak, act in any way, that violates Nampak's policy or anti-bribery laws around the world. Suppliers must also ensure that where Nampak 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.

5. Gifts

Suppliers should be aware that it is not permissible for Nampak employees to give or receive gifts, hospitality or favours that could influence any business decision or that create the appearance of influencing such decision.

Suppliers are therefore not to provide gifts, hospitality or favours to any Nampak employee, their family members or friends other than the following;

- promotional material and reasonable business entertainment such as business breakfasts, lunches, cocktail parties or dinners;
- personal hospitality to events such as sporting events or theatres, provided that travel and accommodation costs are not included;
- business conferences and/or seminars provided that travel and accommodation costs are not included;
- gifts of a value of R500-00 (or the equivalent in local currency for operations outside South Africa) and less.

The giving or receiving of gift vouchers or other cash equivalents above R500-00 (or the equivalent thereof in local currency for operations outside South Africa) or cash (regardless of the amount) is always prohibited.

Any deviations from this will only be allowed if permission is received in writing from a member of the Executive committee for the respective division.

6. Health and Safety

Suppliers who do business with Nampak are required to provide a safe and healthy work environment for all employees working at their sites.

In addition, any supplier employee or representative providing on-site services in a Nampak facility is required to adhere to Nampak safety standards and site rules.

7. International Trade Regulations

Nampak suppliers must adhere to all applicable trade and import regulations that apply to their activities.

8. Labour Practices and Human Rights

Nampak is committed to fair labour practices in the workplace and expects its suppliers to take appropriate steps to ensure that they and their suppliers subscribe to the same principles and practices, which include;

- A Prohibition of all forms of unfair discrimination,
- An intolerance of the inhumane treatment of employees and behaviour which is tantamount to any form of harassment in the workplace;
- A prohibition of the use of child labour;
- The recognition of the right of employees to freedom of association, organisation and collective bargaining;
- Respect for the privacy of all employees;
- The provision of equal opportunities without discrimination on the basis of age, colour, creed, disability, ethnic origin, gender, marital or family status, religion or sexual orientation. In addition all promotions and recognition will be based purely on merit.

9. Protecting the Environment

Nampak Suppliers shall comply strictly with the letter and spirit of applicable environmental laws and regulations. Suppliers must implement and maintain environmental policies to ensure that their actions are carried out in an environmentally responsible way and be transparent about and accountable for their environmental performance;

10. Quality Requirements

Nampak will only do business with suppliers that produce, package, store and ship product in accordance with good manufacturing practices prevailing in their respective industries. Suppliers are expected to provide goods and services that consistently meet required specifications or at the least industry standards.

11. Sustainability

Nampak is committed to the principle of sustainable development, by which is meant 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. Nampak recognises the need for sustainability to;

- minimise consumption of natural resources and waste generation;
- minimise the impact of operations on the environment; and
- maximise recycling where possible;

and requires Suppliers to share its commitment to sustainability.