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	Revisions:
NATIONAL PROCUREMENT (SOLID WASTE)	Date of approval: 14 January, 2015
POLICIES AND PROCEDURES	Page: 1 of 6
TITLE: CODE OF CONDUCT AND ACKNOWLEDGEMENT – SUPPLIERS	

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1. PURPOSE

This code commits EnviroServ suppliers to maintain the highest standards of professional and personal conduct whilst conforming to the EnviroServ Values:

Integrity

Making promises that they can keep – always being honest, ethical and respectful – promoting solution driven actions. Uncompromising on environmental standards. Taking ownership and being accountable.

Innovation

Believe that all have good ideas – encourage and harness them. The responsibility to access and share great ideas lies with us all. Be passionate for improvement and love creativity, growth, vitality and momentum.

Quality

Everyone is responsible for delivering value. Service excellence is a given. We are uncompromising on standards and dissatisfied with the status quo. Continually raising standards. Being professional.

Collaboration

Working together to achieve shared goals, doing what it takes to succeed, never compromising the greater team. Creating positive energy and valuing diversity.

Passion

Willing to always go the extra mile to make things happen. Being proactive. Radiating positive energy in other. Looking for solutions and expressing opinions.

Suppliers shall commit to the following principles:

1. Comply with all applicable laws and regulations
2. Adhere to high ethical standards and respecting the rights and dignity of all persons dealt with
3. Not accepting illicit benefits nor extending such benefits to other persons
4. Be environmentally responsible
5. Not compete in any way with EnviroServ business and avoid conflict of interest to the detriment of EnviroServ
6. Keep EnviroServ's business, financial and technical data as well as internal business documents confidential and not misappropriate EnviroServ's or other company's tangible or intellectual property
7. Actively help EnviroServ in achieving compliance with this Code of Conduct

Adherence of this Code of Conduct will be monitored and violations properly sanctioned.

2. GENERAL GUIDELINES

These guidelines are an integral part of the Code of Conduct, and helps in understanding what the Code means in daily business practice. The Guidelines have been prepared taking into account differences in local laws and practices. They are not to be and cannot be exhaustive. Furthermore, applicable laws and regulations can change. These Guidelines are to be used as an important compass, keeping in mind that daily business judgments often require additional thorough analysis of their legal and ethical ramifications.

Questions regarding the Code of Conduct or these Guidelines or a situation which causes uncertainty about the implications of the Code or the Guidelines (e.g. because of conflicting requirements), should be addressed with a member of EnviroServ's management team.

3. *PRINCIPLES*

PRINCIPLE 1:

Complying with all applicable laws and regulations

Complying with the legal order is a fundamental principle of EnviroServ's business philosophy. It is also an important part of EnviroServ's risk policy. Laws are different from jurisdiction and may change over time. The commitment of the Group to stay within applicable laws and regulations, however, remains always the same. These Guidelines cannot specify nor even list all the laws that govern daily business. It is therefore each ones personal responsibility to be knowledgeable about the legal requirements and restrictions governing daily work.

Particular attention is paid to the following areas of law.

Safety

The safety of services rendered by suppliers is usually dealt with in general or industry-specific regulations. In addition, civil and criminal laws set certain standards that have to be complied with.

Competition law

The following practices are prohibited:-

- agreements amongst competitors on costs or selling prices
- agreements amongst competitors on the allocations of market shares
- agreements amongst competitors on the allocation of territories and customers
- the orchestration among competitors of offers submitted to EnviroServ ("bid rigging")
- paying bribes, kickbacks or other benefits to employees

Tax law

Tax laws include income taxes, sales taxes, withholding taxes and deductions. They differ between jurisdictions. Tax laws do not only have to be compiled with by persons directly dealing with taxes, they also have to be taken into consideration by suppliers. Over-invoicing or under-invoicing for goods or services may violate tax laws if they result in the avoidance of taxes.

Other laws

Various other laws (e.g. corporate laws and security regulations, environmental, employment laws, incl. working place safety regulations, public laws etc.) govern EnviroServ's business. These must be complied with in personal spheres of activity.

PRINCIPAL 2:

Adhering to high ethical standards, Respecting the rights and dignity of all persons dealt with and by not accepting illicit benefits nor extending such benefits to other persons

Respect of the rights and dignity of other persons, be they customers, fellow employees, suppliers, competitors or government officials is an absolute must. The high ethical standards maintained by EnviroServ furthermore requires that employees of the Group do not accept illicit benefits which might be offered to them by customers, suppliers or other persons. This does not mean that every customary present has to be refused. If the value of such a present is (as a rule of thumb) above R350, the gift should be declared to the superior. Likewise extending personal benefits to employees or other persons if such benefits are outside the usual business practices or if they violate applicable laws, is not allowed.

PRINCIPLE 3:

Not accepting illicit benefits nor extending such benefits to other persons

PRINCIPLE 4:

Being Environmentally Responsible

As a minimum EnviroServ ensures compliance with applicable environmental legislation and in many cases, through the use of latest technologies and best practices, go beyond compliance. Our suppliers are encouraged to take a proactive stance in this regard and generate innovative solutions to environmental projects.

PRINCIPLE 5:

Not competing in any way with EnviroServ's business and avoiding conflicts of interest to the detriment of EnviroServ

Suppliers have a fiduciary duty to their employer. This means, inter alia, a supplier is not allowed to actively engage in business directly competing with the EnviroServ Group.

If the supplier is engaged in potential conflicts of interest, these are required to be disclosed to a member of EnviroServ's management team.

PRINCIPLE 6:

Keeping business, financial and technical data as well as internal business documents confidential and not misappropriating the organisation's intellectual property.

Another aspect of the fiduciary duty that suppliers owe to EnviroServ is the obligation to keep all business, financial and technical data as well as internal business documents confidential. Such information may only be disclosed to persons outside the Group if and to the extent that this is required in the course of business transactions on behalf of EnviroServ's business. It is an obligation to safeguard EnviroServ's tangible and intellectual property. It is ethical also to respect the property of other companies, including the property of competitors (e.g. trademarks, software or other intellectual property protected by applicable laws).

PRINCIPLE 7:

Actively help EnviroServ in achieving compliance with this Code of Conduct

Not only is it a requirement to abide by the Code of Conduct in each one's personal activity. Everyone is likewise expected to disclose violations of this Code. Management, in turn, will monitor adherence to the Code of Conduct and will investigate alleged violations. In such an investigation every supplier is required to fully disclose all pertinent facts known to him/her. Non-disclosure in such investigation as well as violations of the Code of Conduct (incl. the acquiescence in violations by subordinates) may result in being removed from the vendor list.

Suppliers who report potential Code of Conduct violations in good faith shall be protected against possible retaliation as follows:

- **anonymous reporting violations**
In principle suppliers may report possible Code of Conduct violations anonymously by means of calling Tip-Offs Anonymous on 0800 00 11 24. EnviroServ however encourages suppliers to voluntarily indicate their name, allowing them to be contacted in order to verify the issue;
- **no discrimination against these employees:**
Discriminatory actions (e.g. sanctions, suspension, threats, harassment) against these suppliers are in violation of the Code of Conduct and treated accordingly. Adequate measures shall be taken to avoid discriminatory actions against such known or perceived supplier who has reported a violation.

EnviroServ Waste Management Code of Conduct Acknowledgement form

I hereby acknowledge that I have received and reviewed a copy of the Code of Conduct and its guidelines. I further agree to abide by the spirit of the code and guidelines, particularly regarding my ongoing obligation and audit regarding such activities. I accept that violations of the Code and guidelines may lead to be removed from the vendor list.

With regards to Principle 5 of the Code and Guidelines I confirm the following:

I have currently no conflict of interest in my activities and will use my best efforts to prevent such conflicts from arising in the future.

If actual or potential conflicts of interest should arise, I will immediately inform EnviroServ and act in accordance with its instruction.

With regard to Principle 6 of the Code and Guidelines I confirm the following:

I agree to promptly submit written disclosure of all inventions, improvements, copyrights and trade secrets, whether or not patentable.

I agree that all such intellectual property within the existing or contemplated scope of business shall be the property of EnviroServ and I hereby assign the title to such intellectual property to EnviroServ.

COMPANY NAME : _____

NAME AND SURNAME : _____

SIGNATURE : _____

DATE : _____