

The Santova Limited Group of Companies (“Santova”) strictly abides by its Culture, Philosophies and Values to ensure ethical conduct when fulfilling its Vision and Purpose. As a leading global supply-chain solutions specialist, ethical conduct applies, not only to its own directors and employees, but also to its suppliers and third-party contractors (subcontractors) as well.

Santova is a non-asset based supply-chain solution’s service provider and therefore considers any suppliers and third-party contractors (subcontractors) key role players and stakeholders. As such, the below principles in this ‘Code of Conduct – Suppliers and Third Parties’ (‘Code of Conduct’) encapsulates the minimum requirements of ethical conduct expected of any of Santova’s suppliers and third-party contractors (subcontractors), who shall commit to:

Respect of Basic Human Rights

- Treat its employees and stakeholders with dignity and respect.
- Promote equal opportunities for its employees irrespective of race, sex, gender, sexual orientation, nationality, age, political conviction or religious conviction.
- Ensure a work environment which does not engage in discrimination, unacceptably hazardous work, physical punishment, harassment, abuse or involuntary servitude of any employee.
- Respect the advancement of human rights in all areas in which the supplier or third-party contractor (subcontractors) operates.
- Allow the freedom of association of employees and the right to collective bargaining.
- Zero tolerance on the use of child or forced labour, slavery or human trafficking. This extends to the meaningful and complete oversight over any subcontractors that the supplier or third-party contractor (subcontractors) may engage with in the provision of their services.

Health and Safety

- Provide a safe environment for their employees in accordance with any applicable laws and regulations and take responsibility for the health and safety of all its employees.
- Manage any hazards and ensure precautionary measures are in place to counteract any accidents and occupational hazards.
- Provide training to employees to ensure there is continuous education provided on health and safety.
- Maintain a health and safety management system to manage compliance within their organisation.

Gifts & Conflict of Interest

- Refrain from providing any Santova director or employee with any cash or cash equivalent gift.
- Ensure any gifts provided to any Santova director or employee are reasonable and provided in an open and transparent manner.
- Refrain from providing any gift or benefit of any kind which shall result in any expectation, undue pressure, or influence on the Santova director or employee.
- Comply with any and all further requirements as contained in Santova’s policies and procedures relating to gifts and such related aspects, where applicable.

Anti Bribery and Anti Corruption

- Comply with Santova’s Anti-Bribery and Anti-Corruption Policy and maintain Santova’s non-tolerance for any form of corruption and bribery.
- Avoid all practices which may grant, offer or promise anything of value to a government official or a counterparty in the private sector to influence official action or obtain improper advantage.

Fair Competition

Refrain from any act or omission which shall be deemed to be anti-competitive, anti-trust, price-fixing, market / customer allocation, market sharing or bid rigging with competitors.

Environmental Consideration and Respect	Confidentiality
<ul style="list-style-type: none"> Comply with any and all applicable statutory and international standards in respect of the preservation and protection of the environment. Maintain and develop programmes to support its own operations in line with such applicable sustainability standards within their industry which includes, but is not limited to, goals aimed at the reduction of green house gas emissions, water use management, efficient energy consumption and waste reduction. 	<p>Keep any information of Santova and its clients confidential and refrain from disclosing any confidential information or trade secrets of Santova and its clients, to any other party, unless Santova has authorised such disclosure or such disclosure is a necessary part of its contract of service to Santova.</p>
Compliance	Further Implementation of this Code of Conduct
<p>Ensure compliance with all laws, regulations, codes and applicable practices within all jurisdictions in which the suppliers and third-party contractors (subcontractors) operate.</p>	<p>Use reasonable efforts to promote and enforce this Code of Conduct amongst subcontractors of the suppliers / third-party contractors (subcontractors).</p>
Whistleblowing Compliance	
<ul style="list-style-type: none"> Ensuring that any complaints, allegations or concerns regarding, but not limited to, any violation of law/regulation, miscarriage of justice, financial malpractice, danger to public health/safety or any gross mismanagement on the part of Santova, any of Santova’s representatives, service providers or third-party contractors (subcontractors) are reported by email to whistle@santova.com. Comply with any and all requirements communicated by Santova and as contained in Santova’s policies and procedures relating to Whistle Blowers. Adhere to any applicable laws in terms of protecting any such individuals from consequential operational detriment or retaliatory/punitive action by the implicated entity involved in any complaints, allegations or concerns regarding Whistle blowing confirmed above. 	

Amendments to this Code & Audits

The concepts contained in this Code of Conduct are evolving principles and Santova reserves the right to update these requirements as and when required and in such circumstances such suppliers and third-party contractors (subcontractors) agree to accept such reasonable changes. Santova reserves the right to conduct audits, in such appropriate cases, to ensure that the principles of this Code of Conduct are being upheld and complied with.

Please do not hesitate to contact any representative of Santova should you have any questions or concerns or require any aspect of this Code of Conduct to be clarified or explained in further detail.

Declaration of the Supplier:

By signing below, the suppliers / third-party contractors (subcontractor) confirms that it has received a copy of this Code of Conduct and hereby commit itself, in addition to any other commitments set out in any other agreement concluded with Santova, to comply with the abovementioned principles and standards.

Thus signed at _____ on the _____ day of _____ 20____.

Supplier Name

Signature

Name

Capacity

This document must be signed by an authorised representative who is duly authorised to sign for and on behalf of the Company. This Code may be signed using any of the following formats: a wet ink signature/physical signature on a paper version of this Code, a digital / electronic signature or an advanced electronic signature as allowed in terms of the applicable law of the jurisdiction of the supplier and/or third-party contractor (subcontractor) signing. The supplier and/or third-party contractors (subcontractors), regardless of the type of signature used above, agree and undertake that it will not contest the validity of the signature.