1. CORE VALUES

Summarized in the Puregas Code of Practice are the internal policy documents, related to business ethics and social and environmental performance. All employees and managers in our company, as well as business partners, are expected to adhere to these policies. A significant attribute of Puregas is the ability to listen to and understand the diverse needs of our customers and other stakeholders, coupled with our capacity to create new and better solutions based on what we learn from this interactive process.

Commitment means that we are engaged in finding the best solution we can deliver. We are as fully committed to our people and to adding value to our customers' business as we are to our targets and goals. We believe that there is always a better way of doing things. That innovative spirit is a vital part of Puregas' identity and a vital part of our way of conducting business. Innovation is the ultimate driver for long-term profitability and growth. Our core values—integrity, empowerment, sustainability, and responsibility as detailed in our circle of excellence—are reflected in how we relate to our main stakeholders.

2. ACCOUNTABILITY

Management

Puregas Management holds positions of authority that make them accountable in all aspects of implementation, communication, evaluation, and enforcement of the business code of practice for the ethical conduct of those who report to them. They fulfil this responsibility by making sure employees are aware of the organization's ethical code and have the opportunity to ask questions to clarify their understanding.

3. FINANCIAL INTEGRITY

3.1. Money Laundering

Money laundering is the process by which individuals or entities hide illegally obtained money by making it appear legitimate. To avoid engaging in acts of money laundering, Puregas strictly follows company payment procedures and is observant of any irregular payments or refund requests with red flags such as:

- Payments made in currencies other than those specified in the invoice.
- Any request to make overpayments.
- Attempts by business partners to make payments in cash or cash equivalents.
- Unapproved payments by someone not a party to the contract.
- Use of an irregular account for the business relationship.

3.2. Import and Export Controls

We are committed to complying with export control and import laws governing the movement of goods, technology, software, and services across borders. Due to the complexity of the Export Control and Import laws, Puregas will not allow:

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- Incorrectly filed export of a regulated or licensable commodity with the South African government.
- Unauthorized re-export of South African goods from one non-South African country to another.
- Inaccurate or incomplete tariff classification, valuation declarations, country of origin, or duties or import tax payments.
- Providing access to controlled technology or information to a non-South African citizen without an export license or exception.

3.3. Proper Accounting

The Company's books, records, and accounts are to reflect accurately and fairly, in detail all transactions, acquisitions, and dispositions of assets by the highest standards of integrity and generally accepted accounting principles. No director or employee shall make false or misleading statements to either the internal or external auditors of the Company in connection with the preparation, audit, or examination of any financial statement or otherwise. No payment made or to be made shall be approved without adequate supporting documentation or with the intention or understanding that such payment is for a purpose other than that described in such supporting documentation.

4. CONFIDENTIAL INFORMATION

We must protect the confidential information supplied to the Company by our customers, suppliers, host governments, and other business partners. Confidential information consists of any information that is not or is not yet public. It includes trade secrets, business, marketing, and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, personnel records, salary information, and any non-published financial or other data.

Puregas' continued success depends on the use of its confidential information and its nondisclosure to third parties. Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment. Furthermore, employees must use their best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information. In case third parties, such as joint venture partners, suppliers, or customers, share with Puregas confidential information, such information shall be treated with the same care as if it were Puregas' confidential information. In that same spirit, employees shall protect confidential information that they have obtained in the course of their prior employment.

4.1. Interaction with the Press and Media

The Company's name shall not be used without prior written approval of the Managing Director in any published article or as part of an employee's public appearance in the media.

Employees should be aware that Puregas may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to Puregas, its employees, or customers.

Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, or that can create a hostile work environment.

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Employees are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the Information Officer/or Line Manager/Supervisor.
If employees find or encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of the Information Officer.

5. SOCIAL RESPONSIBILITY

5.1. Society and the environment

We strive to be a good and reliable corporate citizen, observing the spirit as well as the Legislations and the laws of our country in which we operate.

- We support all internationally recognized human rights and respect those rights in conducting operations throughout the world.
- We recognize that our commitment to financial success must also take into account the broader economic, environmental, and social impacts of our operations.
- We believe in conducting business in a manner that preserves the environment for future generations. Puregas aims to be an industry leader in environmental protection in the application areas served by our products and services. As a part of this, all products and processes shall be evaluated from a quality, safety, health, and environmental perspective. We underpin this through an ISO 9001:2015 quality listing and a well-tried and tested commitment service to our customers in all our areas of business.

5.2. Land Acquisition

In line with applicable national practices, including local land acquisition legislation, Puregas is required to safeguard the proper land acquisition process by:

- Making specific reference to this Policy in the company's standards, policies, and procedures.
- Conducting land acquisition due diligence reviews of ongoing activities and new business opportunities to avoid adverse impacts on the communities in which we operate.
- To ensure a fair and transparent process for project-related land.
- To promote sustainable land use management and protection of cultural heritage areas, environment, and natural resources for the interest of all people in the country.
- To promote people-centred development, participatory decision-making, responsible investment in land resources, and accountable land use administration to support the equitable economic development of the country.
- To identify, manage, and avoid the negative impacts of land acquisition for our business activities.
- Advocating to avoid, minimize, and reduce the adverse resolution of disputes involving land use or ownership rights.
- Further Puregas recognizes that women's land rights are often less protected than those of men, and therefore it aims to give equal protection to the land rights of men and women.

5.3. Our Implementation

We are committed to the following when acquiring land for our businesses to avoid negatively affecting the communities located on or near the land:

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- Identify environmental and social risks and impact on communities.
- Engage with affected communities and stakeholders.
- Obtain independent advice before land acquisition and ensure that affected communities' rights are protected and respected.
- Compensation for affected communities will be just and fair, to improve or restore their standards of living or livelihoods.
- If resettlement is required, we will publicly communicate the resettlement sites, the number of affected persons, and the mitigation measures to restore the livelihood of displaced people.
- Introduce a grievance mechanism to provide opportunities for affected communities to give feedback.
- Communicating Land Acquisition strategy to all employees, contractors, suppliers, and business partners.

5.4. Due Diligence

The primary objective of the due diligence is to verify the status of the designs, for which according to the Land Use Plan no acquisition is required, and to identify, and plan appropriate measures to address outstanding compliance issues (if any).

The main objectives of the due diligence include:

(i) Identify the status of impact and the need for acquisition of the land plots located within the corridor of impact of the Project;
(ii) Review preliminary information on potential land use available in design documents developed by the service provider.
(iii) Review the legal framework based on which the property was acquired and
(iv) Prepare a list of recommendations and if needed a corrective action plan including necessary remedial actions.

5.5. Health and Safety

The safety of employees and other people on our site is our top priority. Every staff member has the right and obligation to challenge and report unsafe conditions including environmentally hazardous work, behaviour, and procedures.

Puregas has created and maintained a safe and healthy workplace through the provision of appropriate training and the necessary equipment, tools, and procedures to employees when carrying out their duties; and takes appropriate measures to ensure that employees refrain from using drugs and alcohol in the work environment which could affect such employees' work performance and thereby pose a risk to the health and safety of other employees.

This commitment is and will continue to be accomplished by:

- Integrating environmental considerations into our business planning and decision-making.
- Identifying, evaluating, and managing environmental aspects associated with our activities to eliminate or reduce the likelihood of adverse impacts on the environment by, for example:

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- Minimising emissions to the atmosphere.
- Minimising the release of effluent.
- Optimising resource consumption by reusing and recycling materials where appropriate.
- Promoting environmental awareness and training for all employees in environmental matters appropriate to their role.
- Encouraging all suppliers to develop environmental policies in line with our Policy and endeavouring to ensure that they comply with environmental requirements; and
- Co-operating and communicating openly with the public and relevant neighbours, government regulatory authorities, and all other interested parties towards the shared goal of improving requirements.

5.6. Harassment and Violation

We do not tolerate harassment: Most common types of harassment in the workplace are discriminatory harassment such as racial, gender, religion, citizenship. Other forms of harassments are physical harassment, power harassment, psychological harassment, cyberbullying, third-party harassment and sexual harassment . Behaviour creating an intimidating, hostile, malicious, degrading, humiliating, or offensive environment— whether verbal or physical—violates our policy and may be against the law. If you believe you have experienced, witnessed, or heard of incidents of unequal treatment or harassment in violation of our policies, you must immediately notify your supervisor or SHEQ department. Our company will promptly investigate each complaint and take corrective action if appropriate. Anyone making such a complaint or participating in an investigation will be protected against retaliation.

6. RELATIONSHIPS

6.1. Employees

- We strive to be the preferred employer of both current and potential employees. We aim to attract, develop, and keep qualified and motivated people in a professional environment.
- We aim to offer a safe and healthy working environment in all our operations.
- We believe in equal opportunities, fairness, and diversity. We recruit and promote based on qualifications for the work to be performed, regardless of race, religion, gender, age, nationality, disability, sexual orientation, union membership, and political opinion. No fee will be levied against workers for the recruitment process.
- We recognize that employees have the right to choose whether or not to be represented by trade unions for purposes of collective bargaining. No discrimination shall be directed against any employee whether such right is exercised or not.
- Under no circumstances will forced or compulsory labour be employed or used in our operations. All work must be conducted voluntarily, and not under threat of any penalty or sanction. We are strictly against child labour and other forms of exploitation of children. We do not employ any person less than 18 years old and adapt to local standards that specify a higher age.
- We are expected to contribute to our company and our performance is rewarded fairly. Legislated minimum wages will always be a minimum rather than a recommended level.

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- We are continuously offered training and development possibilities to safeguard our opportunity to grow with the company. The goal is that each employee receives the competence development needed to achieve good results.
- We are trained on the implications of human rights, safety, corruption, environmental impact, and other related aspects of our operations. This way we ensure that our commitment to respect and support these rights is acted upon.
- We encourage a flow of information across divisional, functional, and geographical borders to make full use of the available knowledge and experience.

6.2. Customers

- We strive to be the preferred supplier to current and potential customers and end-users, which means that we should achieve the highest possible customer and market share.
- We aim to deliver consistently high-quality products and services that contribute to our customers' productivity and prosperity.
- Our products and services are developed to meet the productivity, quality, functionality, safety, and environmental needs of our customers.
- We strive to develop close relationships with our customers to be able to continuously meet and exceed their expectations.

6.3. Suppliers

Business Conduct Standards for Suppliers

For the sake of protecting Puregas' reputation and promoting a strong, dependable supply chain, we expect our suppliers to follow the standards of this Code, or otherwise act in a manner consistent with our standards. Puregas is committed to sourcing responsibly and ensuring that its suppliers conduct their operations in a socially responsible manner. Transparency and sustainability are critical elements of Puregas' supply chain. Puregas expects its suppliers to be good corporate citizens in the communities in which they do business.

6.7. Business partners

- We strive to be the best associate for our business partners, such as suppliers, subcontractors, joint venture partners, agents, and distributors, and to be the one that they prioritize.
- We seek, evaluate, and select business partners impartially based on objective factors including productivity, quality, delivery, price, and reliability, as well as commitment to environmental and social performance and development.
- We make them aware of our commitments and expect them to adhere to our policies.

6.8. Shareholders

- We strive to be the preferred company for shareholders to invest in, and we aim to create, and continually increase, shareholder value.
- We do everything we can to ensure sustainable profitable development with responsible use of resources: human, natural, and capital.

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- We aim to provide a long-term investment return above the industry average, by delivering innovative and competitive products and services to our customers for sustainable productivity.

7. TRANSPARENCY

In all our communications, both written and spoken, we are committed to being open, truthful, and accurate within the limits of commercial confidentiality. We provide reliable and relevant information on our activities in a timely, regular manner. We consider interaction important and therefore have a positive attitude toward constructive dialogues with all of our stakeholders. Puregas has established high reporting standards, where each employee involved in the recording, processing, and reporting of information is expected to safeguard its confidentiality, validity, and correctness. Published material can be accessed through Puregas' website, ww.puregas.co.za offering comprehensive additional information about our brands and operations.

8. BUSINESS INTEGRITY

Wherever we operate, our reputation is a most valuable asset, and it is determined by how we act.

- We shall avoid any action that would jeopardize respect for Puregas.
- We have high standards of business and personal ethics; we adhere to our internal policies, and follow all applicable laws and regulations of our country and in the countries where we operate.
- We do not tolerate bribes and corruption, including facilitation payments. Firm actions will be taken on any violation.
- We are committed to honesty in every situation, and we refrain from having interests that conflict with the interests of our company.
- We support and strive for fair competition, and thus refuse to enter into discussions or agreements with competitors concerning pricing, market sharing, or other similar activities.
- Business gifts or hospitality are offered or accepted only by local legislation, our policies, and business practices.
- We respect company assets and safeguard all tangible and intangible assets of our company from loss, theft, and misuse.
- Puregas does not take political stands. Therefore, we do not use the company's funds or assets to support political campaigns or candidates, or otherwise provide services to political endeavours.

9. GOVERNANCE

The Board has ownership of the Code and performs content and compliance reviews, and it approves the overall company strategy and organization.

9.1. Implementation and compliance

This Business Code of Practice summarizes policies common to all companies. Our behaviour is guided by these internal policies, helping us to increase the value of our company. These policies, along with other principles, guidelines, and instructions, are gathered in SHEQ and the HR department. An internal database is accessible to all employees through Puregas' common drive. Risk assessments about our key stakeholders regarding legal, as well as social and environmental

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performance, are reported at board meetings. To safeguard the implementation, internal audits are conducted on-site. For perceived violations of the Business Code of Practice, the immediate manager or his/her manager should be contacted in the first place. Violations are promptly addressed and subject to disciplinary action.

9.2. Policies and Procedures

The Code of Business Conduct does not address all workplace conduct. The Company maintains additional policies and procedures that may provide further guidance on matters in the Code or address conduct not covered by the Code.

9.3. Ethics & Compliance Office

The Ethics & Compliance Office is managed by our SHEQ department and is available to answer any questions, comments, suggestions, and queries about the Code of Business Practice, or to discuss any concerns you may have about potential Code violations. Employees are invited to comment on this policy and suggest ways in which it might be improved.

10. MONITORING AND REVIEW

The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to ensure that they are effective in upholding our Code of Ethics.

To contact the Ethics & Compliance Office:
Poppy Kgagara
072 279 5643

Gugu Makhathini
061 530 9706

Approved: _____ 15/01/2026

Name & Signature *Date*

Revision history

The following information documents the last changes		
Date	**Revised by**	**Changes**
09/12/2015	New Policy	Gugu Makhathini
12/05/2016	Thomas Xaba	Changed the minimum hiring age for Puregas from 21 years to 18 years.
11/12/2017	Gugu Makhathini	Added Land Acquisition and Due Diligence on land rights.
17/08/2022	Gugu Makhathini	Added social media responsibility.
01/09/2023	Gugu Makhathini	Added new document number
10/09/2025	Gugu Makhathini	Added numbering on the document

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		Amended bullet 5.6 to align with the ILO standards.

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