

	POLICY: ANTI-BRIBERY AND CORRUPTION	www.afrimat.co.za
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Introduction

Afrimat Limited (“Afrimat” or “Company”), as a responsible corporate citizen, not only understands their responsibility, but is committed to act ethically and responsibly in all business dealings and interactions. This policy therefore strives to provide a clear framework for prohibiting private and public sector commercial bribery and emphasises the importance of maintaining accurate books and records for all Afrimat transactions.

As a company we remain committed to abiding by the anti-bribery laws of all the jurisdictions in which we operate and to take reasonable steps to ensure that we apply all applicable anti-bribery and anti-corruption laws.

Values

Afrimat strives to integrate values of accountability, integrity, trust, mutual respect, teamwork, safety and customer satisfaction into every aspect of our culture, every division of Afrimat and our overall performance.

Our commitment

Afrimat is committed to:

- a zero-tolerance approach to bribery and corruption or any similar illegal behaviour.
- ensure that this approach is followed throughout the entire company.
- conduct business in an honest, ethical and transparent manner.
- have an active approach to anti-bribery and corruption behaviours by remaining cognisant of the changes in the regulatory environment and developing appropriate responses.

Applicability

This policy applies to all Afrimat associates, which includes the following:

- Members of the Afrimat Board of Directors
- All employees (permanent and temporary), officers and directors, sub-contractors and/or agents of Afrimat and its subsidiaries.
- All employees (permanent and temporary), officers and directors and/or agents of any joint venture or affiliate over which Afrimat has an interest.

Defining bribery and corruption

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Corruption refers to the misuse of public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

These acts are intended to influence an individual in the performance of their work to act dishonestly and/or improperly. The person being bribed is usually someone who can obtain, retain or direct business for example during a tender or contracting process or it may be through the handling of administrative tasks or customs matters.

A bribe can take many forms, such as for example a direct or indirect promise or offer of something of value, the offer or receipt of a fee or other advantage, donations or voting designed to exert improper influence.

Unacceptable behaviours

The following list explains behaviours that are considered unacceptable, however this list is by no means final or exhaustive.

It is not acceptable for you (or for anyone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope or that this will influence the decision-making of the Company or that a business advantage will be received, or to reward a business advantage already given; or
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure; or
- accept payment from a third party that you know or suspect is offered with the expectation that the Company's decision making will be influenced in any way and that it will obtain a business advantage for them; or
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that the Company's decision making will be influenced in any way and that a business advantage will be provided by us in return; or
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Facilitation payments

Facilitation payments are a form of bribery and typically involve payment made to a public or government official made to secure or expedite a routine action.

At Afrimat, we do not make, and will not accept, facilitation payments of any kind.

Accurate books and records

Afrimat is required to make and keep books and records that fairly and accurately reflect transactions and provide sufficient information to present a complete understanding of every transaction. Transactions should never be made without proper manager approval and should be recorded in a transparent manner which allows for the accurate preparation of financial statements. All Afrimat associates need to ensure that they comply with the books and record-keeping requirements applicable to their roles and responsibilities.

Incident reporting

All employees within the company are required to report suspected violations of this policy or any applicable anti-corruption law to the Chief Audit Executive.

Alternatively, suspected violations may be reported to the Afrimat whistleblowing hotline (<https://www.afrimat.co.za/sustainability/policies>).

All violations reported will be treated as confidential to prevent retaliation and/or victimisation.

Discipline for policy violations

Any person violating this policy may be subject to disciplinary procedures as determined by the company, which may result in termination of employment.

END.