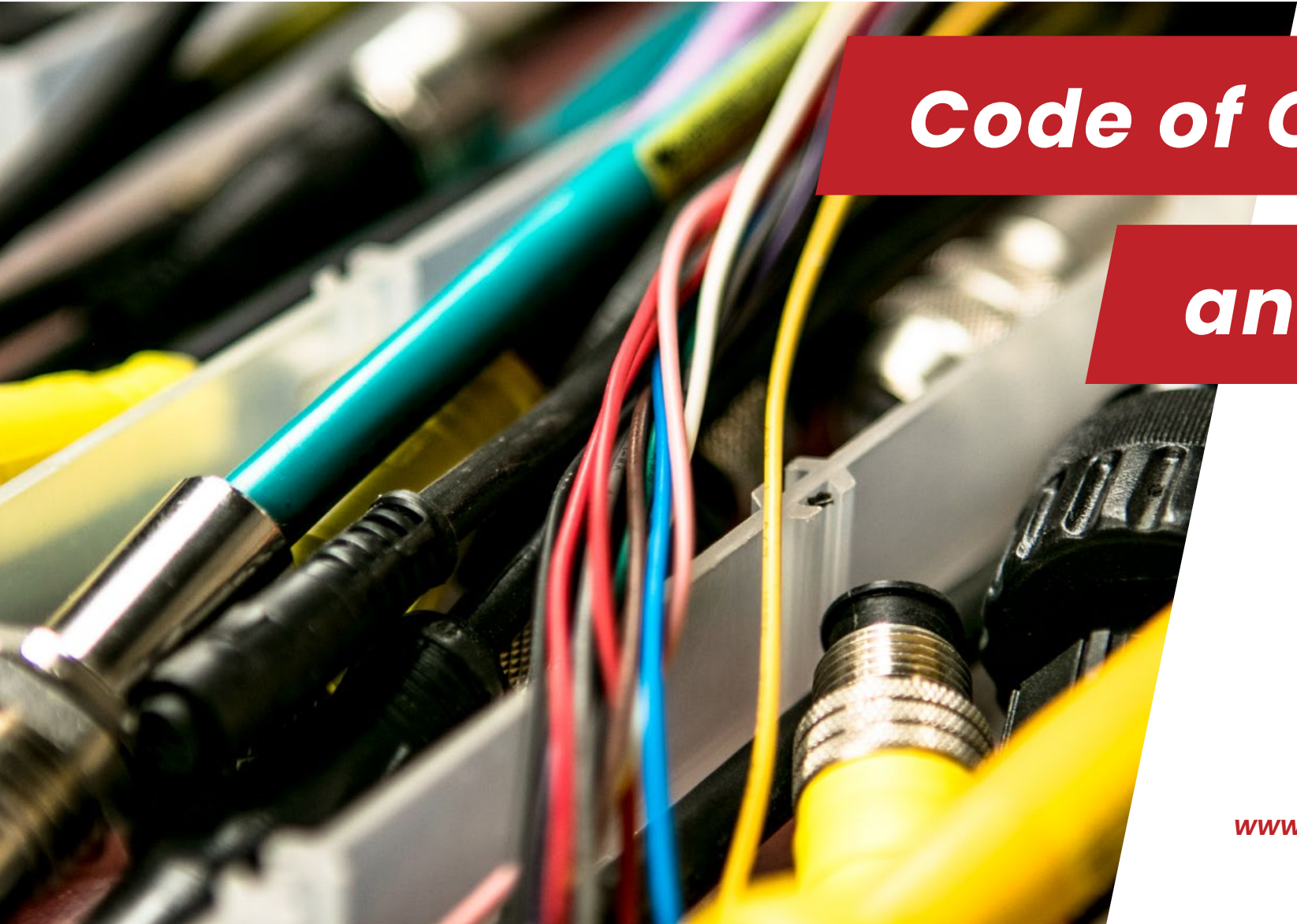




Code of Conduct

and Ethics



We Strive to be Best in Business

At Haslop and Mason Engineering CC (hereafter Haslop & Mason), we have adopted the following Code of Conduct & Ethics, which is informed by our five-point approach to being 'Best in Business':

- 1. Customer-first performance*
- 2. Co-operation and teamwork*
- 3. Accountability and participation*
- 4. Honesty and integrity*
- 5. Mutual respect and consideration*

This Code serves as a guide for the professional conduct of all officers, employees and representatives of Haslop & Mason, and adherence to its provisions is a condition of employment.

The principals of Haslop & Mason have adopted the Code with respect to all of their commercial transactions, whether local or international.

**MUTUAL RESPECT
& CONSIDERATION**



**CUSTOMER FIRST
PERFORMANCE**



**CO-OPERATION
& TEAM WORK**



**ACCOUNTABILITY
& PARTICIPATION**



**HONESTY
& INTEGRITY**



Relations With Customers, Suppliers and Intermediaries

We strive for fair and honest business dealings with our customers, suppliers and their intermediaries, in order to build sustainable, long-term working relationships. This principle governs all avenues of our approach to our customers.

Conflicts Of Interest: Officers, employees and representatives of Haslop & Mason shall avoid any relationship or activity that might impair, or appear to impair, his or her ability to render objective and appropriate business decisions in the performance of his or her job.

Gifts, Hospitality and Entertainment: Haslop & Mason and its officers, employees and representatives shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.



Relations with Employees

Haslop & Mason will recruit and promote employees based on their suitability for the job without discrimination.

Working Environment: We strive to provide a safe working environment where our team can be sure of fair treatment for all. In turn, we require our employees to treat each other with mutual respect and consideration. The development of our team is a priority at Haslop & Mason. We strive to support employees with the training and resources to do their jobs effectively and to grow into leadership roles from within the organisation.

Reporting Requirement: Officers, employees and representatives of Haslop & Mason who find themselves subjected to any form of extortion or who are asked to participate in any way in a bribery scheme shall promptly report these occurrences to senior corporate management, without fear that their employment will be adversely affected.

Company Response: No employee will suffer demotion, penalty, or other adverse consequences for not paying bribes even when Haslop & Mason may lose business as a result of the employee's refusal to do so. Employees are encouraged to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.



Relations with Government and Public Sector

We do not flout the laws of the country or engage in any financial transactions that are in breach of our business Code.

Local and Foreign Laws: We believe in upholding the laws of the countries in which we do business. No officer, employee or representative of Haslop & Mason may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through or with which it seeks to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision.

Bribery and Facilitating Payments: We hold honesty and integrity as the cornerstone of our business dealings and success. No officer, employee or representative of Haslop & Mason may, directly or indirectly, offer or provide a bribe and all demands for bribes must be expressly rejected.

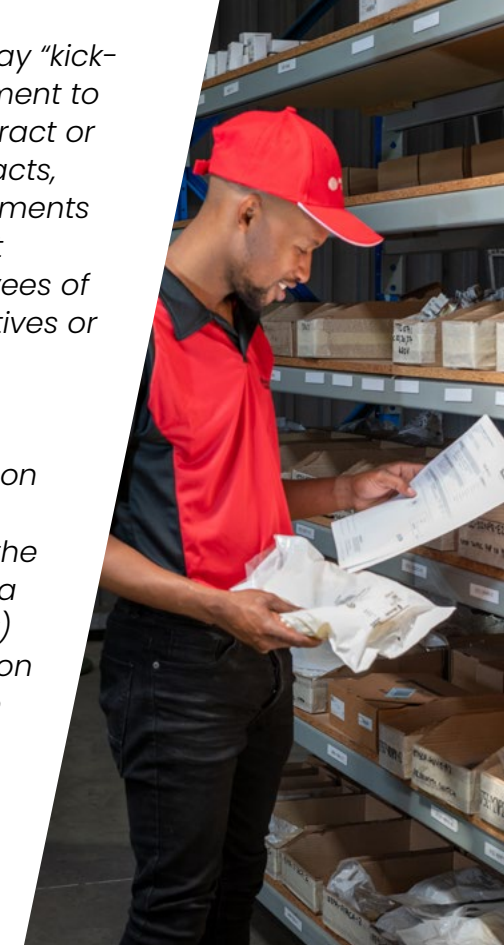
Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

Haslop & Mason and its officers, employees and representatives shall not offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake. Haslop & Mason shall have discretion to deviate from this prohibition if the government action sought is an urgent matter concerning health or safety.

Extortion: Haslop & Mason recognises that extortion is widespread and that participation by the business community increases demand for facilitating payments. We hold ourselves to a higher standard. Haslop & Mason and its officers, employees and representatives shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

Kick-Backs: No officer, employee or representative of Haslop & Mason may “kick-back” any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

A “kick-back” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kick-back) of some of the value of the transaction or benefit for that person without the knowledge or authorisation of the employer or public body to which the person is accountable.



Relations with the Community

At Haslop & Mason, we take our corporate social responsibility seriously and support various non-profit organisations and registered charities that make a difference in our communities.

Philanthropic Contributions: Haslop & Mason and its officers, employees and representatives may make contributions only for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

Financial Compliance

We aim to ensure true, timely and transparent accounting practices and reporting.

Company Accounts: Haslop & Mason shall maintain complete and accurate financial records, ensuring that all transactions are properly, accurately and fairly recorded in a single set of books.



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