

	Department/Section:	008 Human Resources
	Document Type:	Policies
	Document number:	008HR-0522- P
	Old Document number:	HR 020 P
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Title/Name: Code of Conduct Policy		
Document owner: HR Specialist		
Please note that this document has an impact on the following document(s):		

1. PURPOSE

The DMS Powders' Code of Business Conduct (the Code) represents the commitment by DMS Powders to uphold ethical business practices and meet or, where less stringent than our standards, exceed applicable legal and other requirements.

The Code is a reference point for defining how each of us is expected to act when conducting DMS Powders' business.

2. APPLICATION

The Code is applicable to all those who work for, act on behalf of or represent DMS Powders. If you are uncertain about the meaning of the Code or how it is applied, you should raise these concerns with your supervisor or manager.

3. MANAGERS AND SUPERVISORS

3.1 Responsibilities of those who supervise others

Supervisors and manager must take all reasonable steps to ensure that the people for whom they are responsible are aware of and uphold the behaviours outlined in the Code. Supervisors and managers will be held accountable not only for their own business conduct, but for that of their staff.

4. INDIVIDUAL AND FELLOW EMPLOYEES

4.1 Health and Safety

A key Charter value is our overriding commitment to health and safety and our aspiration for Zero Harm to our people, the environment and the communities in which we operate.

Safe operations depend not only on technically sound plant and equipment, but also on every person working for DMS Powders taking appropriate steps to prevent workplace-related injuries and illnesses.

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Employees must understand and follow site and business security procedures and promptly report any circumstances that appear to represent a threat to safety.

4.2 Alcohol, drug and tobacco use

In support of our aspiration of Zero Harm to our people, our environment and the communities in which we operate, all DMS Powders' workplaces are to be free from the use of alcohol and illegal drugs and the misuse of legal drugs or other substances. Smoking is also prohibited in all the buildings.

Repeated poor work performance caused by alcohol or drug use, or impairment that creates a safety risk, may amount to misconduct.

4.3 Equality in employment

DMS Powders is committed to developing and maintaining a diverse workforce and to providing a work environment in which every employee is treated fairly and with respect, has the opportunity to contribute to business success and to realise their potential.

DMS Powders is also required to operate within applicable legislation such as the Black Economic Empowerment legislation.

4.4 Harassment

Harassment is an unwelcome action, conduct or behaviour that a reasonable person would find unwelcome, humiliating, intimidating or offensive. DMS Powders does not tolerate any form of harassment in any of our workplaces.

People are the foundation of our success, and all our people must be treated fairly, respectfully and with dignity.

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4.5 Personal information and privacy

DMS Powders will only collect and retain personal information that is necessary to meet business requirements, and as permitted by law in places where we operate.

5. COMMUNITIES AND GOVERNMENT

5.1 Working with governments

DMS Powders respects the authority of governments wherever we conduct business. We will maintain honest relationships with governments and their agencies, officials and personnel.

Employees and others who make representation on behalf of DMS Powders must comply with all applicable laws and regulations relating to corporate participation in public affairs.

5.2 Engaging with our communities

Our ability to build relationships and work collaboratively and transparently with our host communities is critical to our long-term success. Our aim is to be the company of choice, valued and respected by the communities in which we operate.

We do this by engaging regularly, openly and honestly with people affected by our operations, and by taking their views and concerns into account in our decision making.

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5.3 Political contributions and activities

DMS Powders' approach to corporate participation in political activities is straightforward and applies globally: the Company will not make political contributions in cash or in kind anywhere in the world and will not participate directly in the activities of political parties.

Employees may participate as individuals in political processes provided it is made clear that in doing so they are not representing DMS Powders.

5.4 Environment and stewardship

DMS Powders has an overriding commitment to environmental responsibility. We strive to achieve the efficient use of resources, including reducing and preventing pollution, and enhancing biodiversity protection by assessing ecological values and land use in our activities.

Our stewardship approach is designed to ensure that the lifecycle health, safety, environment and community (HSEC) impacts associated with resources, materials, processes and products related to our businesses are minimised and managed.

6. OUR BUSINESS PARTNERS

6.1 Bribery and corruption

Bribery involves making a payment of any value to any person deliberately to distort a proper decision-making process to influence a person's decision, to encourage them to secure an improper commercial advantage, or to enter into a dishonest arrangement.

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DMS Powders prohibits bribery and corruption in all its business dealings in every country.

6.2 Conflict of interest

DMS Powders respects the privacy of its employees. However, on the job or in your personal time, nothing you do should conflict with your responsibility to DMS Powders or compromise, or appear to compromise the quality of your work performance, your commitment to your work and your ability to make impartial business decisions.

6.3 Gifts and hospitality

Offering or accepting gifts and hospitality is a legitimate contribution to building good business relationships. It is important, however, that gifts and hospitality never unduly influence business decision-making, or cause others to perceive an undue influence.

It is prohibited to offer or accept cash, loans or personal cheques, product or service discounts that are not available to other employees, gifts or hospitality of an inappropriate nature or gifts and hospitality not designed to further a valid business purpose or relationship.

6.4 Business travel

DMS Powders will cover the cost of moderate expenses incurred provided that valid invoices or records are supplied.

6.5 Competition and antitrust

Most countries in which DMS Powders operates have developed antitrust (or competition) laws that are designed to prohibit a range of practices that restrain

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trade or restrict free and fair competition, such as price fixing and acts designed to achieve or maintain the power of a monopoly or cartel.

Conduct in breach of these laws is strictly prohibited.

6.6 Maintaining supplier relationships

Supplier relationships can make a significant contribution to the success of DMS Powders. We aim to have effective, streamlined processes with suppliers, and encourage suppliers to adopt standards and procedures similar to those of DMS Powders.

If there is any doubt or concern in relation to the supplier or potential supplier's integrity or ability to perform the contract, you should ensure that these issues are resolved.

6.7 Use of third parties

In many countries, business practices or other conditions require the use of agents or third parties to work on behalf of DMS Powders and represent DMS Powders' interests.

Third parties must be chosen carefully and engaged appropriately, as any improper conduct could damage DMS Powders' reputation and expose the Group and individual employees to criminal or civil legal liability or other sanctions.

6.8 Trade controls

DMS Powders complies with all applicable national and international laws, regulations and restrictions relating to the movement of materials and services around the world.

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7. OUR BUSINESS RESOURCES

7.1 Protecting DMS Powders' assets

All DMS Powders' employees are responsible for safeguarding and appropriately using DMS Powders' assets under their control. DMS Powders' assets must not be used for personal benefit.

7.2 Accuracy of records and reports

All data created and maintained by DMS Powders' employees must accurately reflect the underlying transactions and events. Falsifying, concealing, altering, destroying or otherwise tampering with information, or creating misleading information will not be tolerated by DMS Powders, and may also be illegal.

7.3 Information systems

Computer hardware and software and all data on DMS Powders' information systems, as well as any DMS Powders' data on your home or non-Company digital systems, are the property of DMS Powders.

DMS Powders' information systems should always be used in a responsible manner. Inappropriate material is not permitted to be accessed or stored on DMS Powders' systems in any form.

7.4 Insider trading

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In the course of your job you may learn of information about DMS Powders or other companies – for example, a competitor, joint venture partner, customer or supplier – before it is made public. Using this inside information for your financial or other personal benefit or conveying this information to others may be illegal.

In addition, where DMS Powders has a relationship with another company, you should exercise caution if you wish to trade in that company's shares.

7.5 Communicating externally

DMS Powders must provide timely, accurate, consistent, complete and fair disclosure of information to enable investors to make informed and orderly market decisions. Public disclosures must only be made by authorised spokespersons.

7.6 Intellectual property

Intellectual property (IP) can be an invention, trademark, original design or the practical application or expression of a good idea that has commercial value. All employees must work to safeguard DMS Powders' intellectual property from use by outsiders.

8. WHEN IN DOUBT

8.1 If you are in doubt about what to do or whether to speak up, it may help to do the **Business Conduct Quick Test** by asking yourself some simple questions -

8.1.1 **The values test:** Does it fit our values?

8.1.2 **The safety test:** Could it directly or indirectly endanger someone or cause them injury?

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8.1.3 **The law test:** Is it legal and in line with our policies and standards?

8.1.4 **The conscience test:** Does it fit with my personal values?

8.1.5 **The newspaper test:** If the story appeared in the paper, would I feel comfortable with the decision?

8.1.6 **The family test:** What would I tell my partner, parent or child to do?

8.1.7 **The 'feel' test:** What's my intuition or 'gut feel'? If it 'feels' bad, then it probably is bad!

8.2 Failing any of the above 'tests' indicates that you need to talk with someone about the concern you have.

8.3 If you have any doubts about the proper course of action, always seek advice.