



WINNING WITH INTEGRITY

AMSONS GROUP CODE OF
BUSINESS CONDUCT



- Winning with integrity is key to sustainable success.
- Acting with integrity creates trust, protects our reputation, lowers the cost of doing business, and enhances stakeholder value.
- Acting with integrity is about doing the right thing all the time. It starts with behaving in compliance with our Code.

“ It is our duty to **act with integrity** and to hold each other **accountable** to do the same.

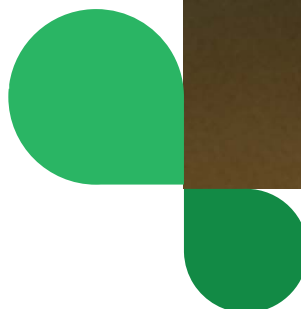


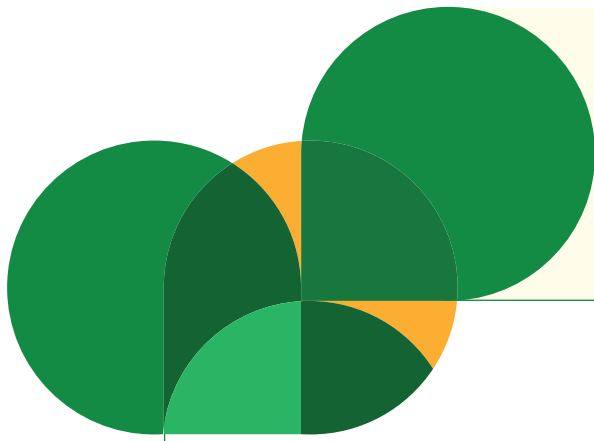
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“ We are all
responsible for
the success and
reputation of
Amsons Group.





Message from the Group Managing Director



Dear Colleagues,

As a leading conglomerate within the region, it is imperative that each one of us acts with integrity. We are accountable for compliance. This is our commitment to our customers, our suppliers, colleagues and all other stakeholders. Doing the right thing is a requirement for the ongoing success and sustainability of our company. Our reputation and continued license to operate demands that we always act with integrity, driving excellence in everything we do.

Our Code of Business Conduct defines the behaviors expected of all employees. While it cannot explicitly cover all business situations, it sets out the spirit in which we operate. Acting with integrity is essential to upholding the trust bestowed upon us by our stakeholders. We rely upon all our employees to act with integrity every day - with no exceptions.

We are very proud of our products, operating standards, and our people. We are uniquely placed within the region and we should all embrace the opportunities, and the responsibility, that this position provides.

Please read and ensure that you understand the guidelines contained in the Code of Business Conduct. If you are unsure about anything, discuss it with your line manager. I expect everyone to work and act according to both the letter and the spirit of the Code across all our operations, at all times.

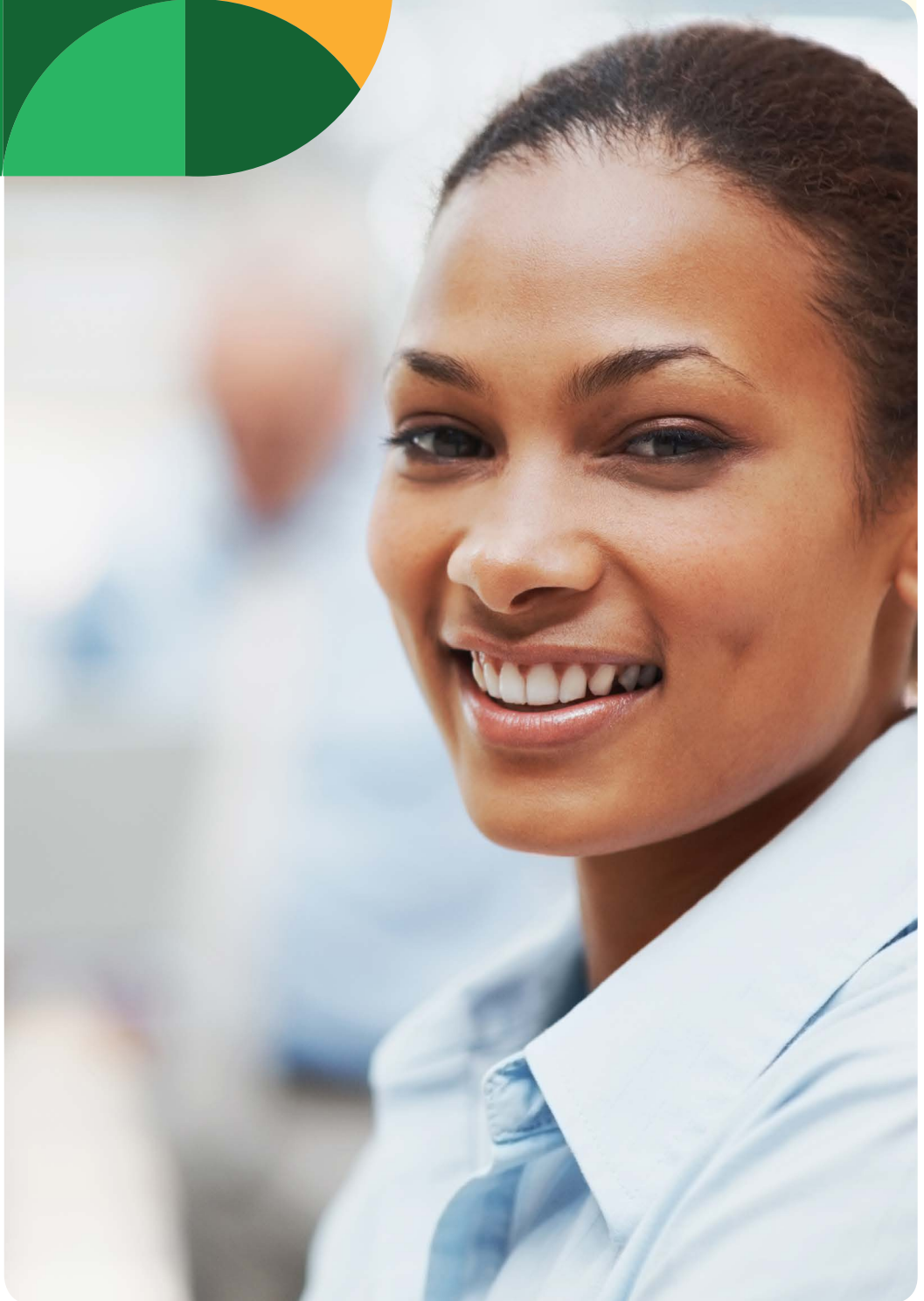
We are all responsible for the reputation of Amsons Group. I can count on you to put integrity at the center of everything we do.

Best regards
Edha Nahdi
Group Managing Director

INTEGRITY IN THE **WORKPLACE**



01



INTEGRITY IN THE WORKPLACE

Introduction

Our Code offers guidance and provides examples to help you when you are confronted with challenging situations in your daily work.

Acting with integrity Amsons Group (hereinafter called Amsons) strives to create an environment where trust, accountability and transparency flourish and compliance is a central focus. Using good judgment together with our Code and Amsons policies will usually be sufficient to ensure business is conducted with integrity. Our Code cannot anticipate every situation we might encounter in the workplace, but it will help us to make sound and ethical decisions. We expect our employees to have the courage to take the right decisions based on our ethical principles and to uphold them, even when under pressure.

To whom does our Code apply?

Every Employee, director, and officer (“employees”) in Amsons must follow this Code at all times when representing or working for Amsons.

All persons, including service providers, subcontractors, and business partners, will be required to act consistently with our Code when acting on our behalf or in our name.

Higher standards for supervisors

Supervisors at all levels have additional responsibilities under our Code which include creating an open environment in which employees feel comfortable to ask questions, raise concerns, and report misconduct.

Violation of our Code

We must all adhere to our Code. Violations of our Code, our policies, or the law can have serious consequences, including disciplinary action up to and including termination of employment, as well as possible civil or criminal penalties both for the company and for individuals.

Before you act, always ask yourself, is my conduct:-

- Honest, ethical, or lawful?
- Does it comply with our Code and company policies?
- Consistent with our Mission and Values?
- Respectful and considerate to people, such as colleagues, customers, or stakeholders?

If the answer to any of these questions is “NO” or even “MAYBE”, you have identified a potential issue and should seek guidance among the many resources available to you, such as your supervisor, Human Resources, and/or Legal and Compliance.

1.1 Health and Safety (H&S)

At Amsons, employee and public safety is our highest priority. We uphold a zero-tolerance policy for safety violations and ensure that comprehensive safety measures are consistently enforced across all operations. To achieve this, we need the commitment of everyone.

We aim to provide a safe and healthy work environment and also to work with employees and contractors to develop a culture that encourages both personal and collective responsibility for H&S.

We integrate H&S into all business processes and encourage a culture where concerns are raised and solved within the business unit and with the support of the H&S function.

Health and Safety is a core value for Amsons and this means that every single employee and contractor who comes into contact with Amsons must know what to do to prevent a serious injury or fatality.

The Health and Safety Rules:

Rule 1 - I assess and control risks before starting any task.

Rule 2 - I only perform activities for which I am authorized.

Rule 3 - I never override or misuse health and safety devices, and I always use the required PPE.

Rule 4 - I do not work under the influence of alcohol or drugs.

Rule 5 - I report all incidents.

Living by these rules is a condition of employment.



Putting the Code into Practice

01

You notice that a fellow employee in the production area is working without wearing their dust mask and safety boots. What should you do?

PPE is not optional – it is essential. Politely remind your colleague to wear their PPE and report to your supervisor or the H&S officer. It is everyone's responsibility to ensure a safe work environment.

02

You arrive early at work one morning and see your colleague having what appears to be a soft drink. Upon greeting your colleague, you notice a slight smell of alcohol on his/her breath. When you ask if he/she has had an alcoholic drink, he/she tells you that he/she has not. What should you do?

In order to make sure everyone is safe in the workplace, it is important that you raise your concern about your colleague with your supervisor or Human Resources. Your colleague may have a problem that he/she needs help with, and working while under the influence of alcohol can impair the safety of more than just himself/herself.

03

You are aware of a H&S related incident in your department and suspect that it has not been reported according to the rules. What should you do ?

Ensure your supervisor is aware of the incident and confirm with them that the issue has been reported. If you are uncomfortable speaking directly with your supervisor about the issue, speak with the H&S officer.

Work Helmet

Safety Glasses

Gloves

Safety Belts

Safety Carabiner

Safety Boots



1.2 Diversity, Inclusion and Respect

Amsons takes pride in having a diverse workforce and treats all employees with dignity.

We believe we have a responsibility to treat each other with dignity, which means appreciating diversity, whether that diversity exists because of race, religion, gender, or any other difference. We value and promote a workplace that is inclusive and fair and which fosters respect for all of our fellow employees, customers, and business partners.

We all strive to create an environment in which personal dignity, privacy, freedom of association and collective bargaining, and the personal rights and safety of every individual are part of our everyday work experience. We believe respect in the workplace is fundamental to performance and engagement.

All employees without regard to job title or level will be treated fairly in matters affecting promotion, training, hiring, compensation and termination.

Respectful Workplace

A respectful workplace encompasses acting with truth and honesty with one another, as well as following the law, our Code of Conduct and Company policies and values. Amsons takes pride in our commitment to promoting a diverse, equitable, and inclusive workplace that values individual differences. Every employee is accountable for creating and maintaining a welcoming and respectful work environment where people of all backgrounds and individual characteristics can thrive.

Harassment

“Harassment” is a form of discrimination that consists of unwelcome behavior and has the purpose or effect of creating an intimidating, hostile, or offensive work environment. Harassment can come in many forms, including physical actions, verbal or written remarks, or visual depictions. Sexual harassment is evidenced by unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that tends to create a hostile or offensive work environment. Amsons strictly prohibits any form of harassment, whether done by an employee or a non-employee.

Discrimination

We work together with individuals of various ethnic backgrounds, cultures, religions, ages, disabilities, medical conditions, races, gender, and affiliation to political organizations, unions, or minority groups. Consistent with our respect for each other and with the employment laws of numerous countries in which we work, we do not tolerate discrimination against anyone on the basis of any of these characteristics or any other comparably offensive behavior. These principles extend to all employment decisions including recruiting, training, evaluation, promotion, and reward.

1.3 Protection of our company assets

All employees are responsible for protecting our company assets and using good judgment to ensure that physical and intellectual property as well as financial assets are not damaged, stolen, misused or wasted.

Protecting physical assets

Amsons' physical assets, such as equipment, materials and facilities, are instrumental to performing our day-to-day jobs. By working for Amsons, we each have assumed responsibility for these assets and must safeguard them from theft, loss, misuse, and waste. In addition, we must make sure that all resources are used for appropriate business purposes.

Protecting proprietary assets

At Amsons, we regularly produce valuable, non-public ideas, strategies, and other kinds of business information, which we own and need to protect as intellectual property. Such information is a large part of what gives us our competitive advantage. Improper disclosure of such information is prohibited, and we must be mindful of the risks of improper disclosure of confidential information.

Employee and third-party confidential information

Access to prospective, current or former employee records and personal data, including performance evaluations, salary, pension and benefits, is only permitted to persons with proper authority and in accordance with data privacy laws. In addition, we are responsible for protecting confidential information entrusted to us by our customers, suppliers and other business partners as carefully as we protect our own Information.

In the ordinary course of business, information is acquired about other companies, including customers, suppliers, and competitors.

There are, however, legal and ethical limits on acquiring competitive information:

- We should not acquire information through improper means, such as through bribery or spying on our competitors.
- We should generally not request or obtain competitive information from non-public sources. Consult Legal and Compliance to clarify what "non-public" means in a particular situation if you have any doubts.
- We should not hire an employee of a competitor to get confidential information or encourage employees of competitors to disclose confidential information about their former employer.
- We should not accept information offered about a competitor that may be confidential. You should ask if it is confidential, how it was obtained, and if the material being offered carries a classification such as "secret", "confidential", "proprietary", or "for your eyes only".

Putting the Code into Practice

01

During my commute to the office in a bus, I sometimes make work related calls. Is this a problem?

You must be careful not to discuss non-public company information in public places, such as in taxis, public transport, elevators, or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings.

02

What should you do if a competitor sends you an email with a confidential document attached to it by mistake, as a result of mixing up your name with someone else's?

If you realize it is an error and you know the attachment is confidential, do not open it, forward it, print it out or share it. If you have opened the document, close it, do not act upon the information, and contact the Legal and Compliance officer immediately. In any event, do not delete the mail before speaking to the legal and compliance officer.



1.4 Information systems, email, and social media

Technology in the workplace enables us to work and serve our stakeholders more efficiently. We rely on it to support our processes and interactions around the region.

Internet access, email and other applications are provided for business purposes. All business communication and collaboration internally with other Amsons employees and external third-parties must be done using Amsons approved electronic communications and email accounts. In sending and receiving email communications and attachments you must apply the same standards of care as used in hard copy communications. It is prohibited to disclose externally (including to press, investors or otherwise) or post to social media sites, Amsons information or communications without authorization.

You must not abuse Amsons' IT systems, Internet access, email accounts, or any other information and communication media for illegal or unethical purposes. Searching, downloading, or forwarding information that is abusive or offensive may lead to disciplinary measures. You must also be aware that you are not allowed to use or copy software or data from Amsons IT systems for private purposes unless explicitly authorized by the IT department to do so. Abuse could hurt us competitively, affect our financial results and damage our reputation.

Social media allows us to communicate instantly and widely. Think carefully before disseminating images or text involving your work, colleagues or workplace. Unforeseen consequences could include damage to the reputations of individuals or to Amsons.

Putting the Code into Practice

01

You are having lunch with your colleague. She informs you that she intends to share company information on social media. What should you do?

You should inform her that employees are not allowed to share any company information on social media without prior approval from your Line Manager, Head of Communications, Legal and Compliance officer and the Country CEO.



02

INTEGRITY IN
BUSINESS PRACTICES



2.1 Anti-bribery and anti-corruption

Amsons expects all its employees and third parties acting on Amsons' behalf to comply with all applicable anti-bribery and anti-corruption laws.

Amsons prohibits directly or indirectly offering, promising, authorizing or making an improper payment (cash or anything else of value) to anyone, including a government official or government employee, in order to obtain or retain business for Amsons, or to acquire an improper business advantage. You also may not accept any such payment in exchange for conferring an improper business advantage. Amsons also expects its business partners and third parties acting on its behalf to share Amsons commitment to comply with anti-bribery and anti-corruption laws when doing business that relates to Amsons.

Some examples of non-cash items that may violate anti-bribery or anti-corruption laws, or our Code, and could be improper:

- Gifts
- Meals
- Entertainment
- Travel benefits
- Other business courtesies

For more information, see our Anti-Bribery and Anti-Corruption Policy, our Gifts, Hospitality, Entertainment and Travel Policy. If you have any doubt about the propriety of giving or receiving a gift or courtesy, immediately contact the Legal and Compliance officer before acting.

The term "third parties" can include consultants, subcontractors, franchisees, sales agents, resellers, customs brokers, accounting or law firms, or companies that provide assistance with obtaining visas, permits, or inspection certificates, and joint venture partners. Regardless of the type of third party, it is critical that all third parties who conduct business or provide services for or on behalf of Amsons are selected and engaged in compliance with Amsons Third Party Due Diligence Guidance.

2.2 Gifts and hospitality

Good business relationships are built on trust and goodwill, and because we value and respect our customers and business partners, either party may want to acknowledge this from time to time by offering gifts and hospitality.

By exercising common sense, discretion, and sound judgment before offering or receiving any gifts or hospitality, we can avoid good intentions being misinterpreted. Gifts and hospitality must always be moderate and should never be used to exert improper influence or create a perception of or actual conflict of interest.

With regard to gifts or hospitality to public officials, you should always be cautious. Public officials are widely defined and cover any person exercising a public function for a given country (civil servants), which can include employees of a public agency or state-owned enterprise.

We recognize that some countries in which we operate have laws relating to gifting to government officials and we shall comply with the said laws.

If you are planning to offer a gift or hospitality to a public official and are unsure, refer to the Legal and Compliance officer.

All gifts and hospitality offered and provided to others on behalf of Amsons, or received by any Amsons employee must be properly declared to the Legal and Compliance officer and recorded in the Gifts, Hospitality, Entertainment and Travel (GHET) register in line with the GHET policy.

Hospitality

Hospitality includes meals and refreshments, as well as cultural, entertainment, or sporting events where at least one Amsons employee acts as a host and attends. If no Amsons employee is attending then the hospitality is a “gift” and subject to the rules on gifts.

Gifts

Gifts can include goods or services as well as other things of value, for example, loans, school fees, medical care expenses, and trips or tickets to cultural, entertainment, or sporting events. Cash gifts or their equivalent (such as gift vouchers) and tips are not permitted, with very limited exceptions that have been preapproved by the Legal and Compliance officer.

Returning a gift

If a gift exceeds the standards set out in the GHET Policy, tell your supervisor, document its receipt in accordance with applicable laws and policies, and politely return the gift explaining that Amsons internal rules do not permit the acceptance of such gifts.

If returning a gift is really impractical or would cause significant offense to the giver, it must be surrendered to the Legal and Compliance officer who shall handle the same as per the GHET policy.

2.3 Fair competition

At Amsons, we aim to outperform our competition by having superior quality products and services.

At Amsons we adhere to all laws intended to protect and promote free and fair competition. We work towards outperforming our competition fairly and honestly by having superior products and services through ethical and legitimate business practices.

You may not use or acquire proprietary information or trade secrets that were obtained improperly or try to obtain such things improperly yourself. Do not improperly try to get current or former employees of other companies (or anyone else) to give you confidential information.

If you find yourself with information that could be a trade secret or other confidential information of another business or customer, or if you have any questions about this section of the Code, you must immediately consult your supervisor and the Legal and Compliance officer.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition when purchasing products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not based on special favors

Our employees must never directly or indirectly:

- Enter into agreements, understandings or coordinate activities with actual or potential competitors to:
 - Fix prices, premiums, or any specific elements thereof;
 - Limit or restrict the kind or quantity of products or services supplied;
 - Allocate markets geographically or according to trading partners, customer segments, or product lines;
 - Engage in any communication with competitors about bids;
 - Set the terms or outcome of a bidding process;
 - Boycott suppliers or customers as a means to prevent the supplier or customer from dealing with a competitor.
- Abuse a dominant position in a particular market.
- Enter into agreements or arrangements with entities operating at different levels of the production or distribution chain, such as suppliers, distributors or retailers, which lessen or eliminate free and fair competition.
- Exchange competitively sensitive information.
- Engage in any other behavior that would otherwise limit competition in breach of applicable laws and regulations.

There are many forms of conduct that may be subject to antitrust laws. You must abide by these laws as well as Amsons internal policies and seek guidance from the Legal and Compliance officer if you have any questions or concerns.

Putting the Code into Practice

01

You are asked by a colleague to obtain pricing information of our competitor. What should you do?

There is a law that regulates competitor information. You should immediately consult the Legal and Compliance officer for advice.



2.4 Accurate Business records and financial Integrity

In all our dealings and in every form of communication we are accurate and transparent. We ensure that all our disclosures comply with applicable laws and regulations.

Our records serve as a basis for managing our business and are important in meeting our obligations to all our stakeholders. We rely upon our records to prepare periodic and current reports that we file with the relevant regulators.

Employees have a responsibility to ensure that records created on behalf of Amsons represent the facts objectively and accurately. Falsification or improper alterations of records is prohibited. You must never instruct someone else to prepare or approve a false or misleading record or to do so yourself at the direction of another person. When preparing records, we must all act with integrity so that information is not incorrectly withheld, incomplete or misleading.

Document/record retention

Company records must be retained according to applicable laws and Amsons's policies and guidelines. The destruction, concealment or alteration of any record that you have been instructed to keep is prohibited. If you know or believe there is a possibility of any litigation or internal or external investigation involving any record in your possession or under your control, you must retain that record and produce it promptly when instructed to do so.

Timely, complete and honest recording of financial and non-financial information and the proper retention of our documents and records is essential to our business and is important for our:

- Credibility and reputation;
- Legal and regulatory obligations;
- Ability to make accurate projections and business decisions; and
- Responsibility to shareholders and other external stakeholders.

Putting the Code into Practice

01

As the financial controller you have discovered that the physical stock of clinker is much lower than in the books. The potential loss is huge. You talked to the CEO who replies that he cannot afford any provision this year as he is already behind his targets. He remarks that the loss should be spread out over the coming years. Is this okay with you?

No, in spite of the CEO's answer, you have the responsibility to ensure that the reporting is full, fair, accurate, and timely. If you were to follow this instruction, you would be falsifying documentation.



2.5 Conflicts of interest

We all have a duty to act in the best interests of Amsons at all times and not based on personal interests.

A conflict of interest may arise when our personal, family, financial, political or other interests interfere, or may be perceived as interfering, with our ability to perform our jobs effectively or make the right decisions on behalf of Amsons. Where we can, we avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing business on behalf of Amsons.

When such relationships or activities cannot be avoided, you must disclose them promptly in writing to your supervisor and the Legal and Compliance officer. In addition, you should similarly disclose any personal interest that could be perceived as having a connection with the execution of your professional duties. In case of doubt, disclosing such relationships or activities is in your interest. Transparency often removes any perception of improper activity.

Outside engagements

You may be invited to serve as a director, consultant or member of management of an outside organization. You should first check whether such engagement is allowed under the terms of your employment contract, and in addition make sure that it would not unduly interfere with your work for Amsons. Further, if this organization is a competitor, conducts business with Amsons, or is a public or state-owned company, the engagement must be approved by the Legal and Compliance officer and your supervisor. The same approvals are required for employees wishing to run for public office. While not necessarily prohibited, many official public positions will present actual or potential conflicts of interest for the holder with the business of Amsons.

If you are concerned as to whether something may be a conflict of interest, please engage the Legal and Compliance officer for guidance.

“ We never use Amson’s property or information for personal gain or take personal advantage of any opportunity that arises in the course of our work for Amsons.

Putting the Code into Practice

01

You are part of a team evaluating bids for a supply contract. One of the bidders is a company owned by your brother in law. You believe they can do the job well. What should you do?

Even if the company is qualified, your personal relationship creates a conflict of interest. You must disclose this relationship to your supervisor and the Legal and Compliance officer, and you should not participate in the selection process. Transparency is essential to maintain integrity and trust in the procurement process.

02

I have been approached by friends to invest in a company that transports raw materials for Amsons. Does it constitute a conflict of interest if I take only a financial stake, without any say in the management?

It is at least a potential conflict. Whether it is an actual conflict depends on various factors, including:

- The position you hold in Amsons;
- The influence you have in the selection of Amsons suppliers;
- The amount of your investment and relative shareholding;

In any event, you should inform your supervisor and the Legal and Compliance officer before investing in the company to obtain proper guidance and counselling.



2.6 Insider trading

Amsons supports open and fair securities markets because they are key to building trust and investor confidence.

Insider trading occurs when a company's securities are traded on the basis of material, non-public information that could reasonably affect a person's decision about whether to trade in those securities.

Information is "material" if a reasonable investor would consider the information important when deciding to buy, sell or hold that company's securities.

Information is "non-public" until it has been disclosed and adequate time has passed for the securities markets to digest the information.

Examples of material, non-public information include:

- Advance notice of changes in senior management;
- Unannounced mergers or acquisitions;
- Pending or threatened litigation;
- Non-public financial results;
- Development of a significant new product;
- An unannounced stock split.

We do not trade in securities of Amsons, any Amsons company, or any other publicly listed company on the basis of insider information obtained while working for Amsons.

“Insider trading laws not only prohibit trading in securities on the basis of inside information but also the sharing of such information with third parties.

2.7 Sanctions & Embargoes

Amsons is committed to complying with international sanctions and other trade restrictions.

In the course of doing business, we must comply with all applicable export and import laws, including trade sanctions, embargoes, and other laws, regulations, and government orders or policies that affect trade.

Whether a product, service, or technology can be exported from one country to another depends on many factors including the nature of the item, its country of origin, its end use and end user. Sanctions and embargoes restrict transactions with certain countries, named individuals, and entities, and for certain end uses.

We must therefore be aware of these restrictions and obtain all documentation as may be required before engaging in a transaction or exporting our goods.

“ We must not do business, directly or indirectly, with individuals, entities or countries if doing so fails to respect existing sanctions and embargoes. It is therefore key that we know the identity of our customers, suppliers and other business partners.

Putting the Code into Practice

01

You are asked by a customer to deliver cement to an unfamiliar company located in a neighboring country. This country is subject to sanctions imposed by the UN. You do not know if you can, or should, accommodate the customer's request. What should you do?

You should ask the Legal and Compliance officer how to handle the request. The ability to ship will depend on many factors, including the country the customer wishes you to ship to, the product being exported, how the product will be used and by whom.



2.8 Preventing money laundering

Amsons's objective is to conduct business with reputable business partners who conduct lawful business activities and whose funds come from legitimate sources.

Money laundering involves disguising financial assets so that they can be used without detection of the illegal activity that produced them. Such illegal activities could include terrorism, drug trafficking or bribery. The crime occurs when criminally derived money is integrated into the stream of commerce so that it appears legitimate or its true source or owner cannot be identified.

In order to prevent Amsons from being used as a means to launder money, our employees follow all accounting, record keeping and financial reporting requirements applicable to cash payments and other forms of payments in connection with our business transactions.

As Amsons employees, we all need to be vigilant with regard to detecting payment irregularities and suspicious behavior of customers and others.

If you have suspicions or questions about a proposed transaction, raise questions with your supervisor or the Legal and Compliance officer.

Red flags for possible money laundering

We all need to be vigilant to potentially suspicious transactions, such as when a business partner:

- is reluctant to provide business background information;
- wants to pay in cash;
- wants to overpay or pay in a different currency to that of the invoice;
- wants to receive or pay funds into or from multiple bank accounts, or through a third party.

03

INTEGRITY IN THE
COMMUNITY



3.1 Environment

As a responsible group of companies, we recognize our continuing obligations towards the environment, and the need for active engagement in preserving natural resources. We are committed to environmental sustainability, responsible resource management and adherence to local regulations, whilst minimizing the negative environmental impact.

Amsons is committed to protecting the environment and natural resources on which we all depend. We recognize that environment and natural resources are valuable assets that must be sustainably managed for present and future generations, and to that end have developed policies with a strong focus on:

- Use of sustainable raw materials and practices;
- Quarry rehabilitation/restoration and biodiversity management;
- Compliance with environmental laws and third-party requirements;
- Monitoring and reporting environmental compliance and performance.

Amsons is also subject to many government requirements and environmental laws that set minimum standards. At Amsons we strive for a higher standard of conduct.

We regularly audit performance in these areas and develop action plans to continuously improve our performance.

We encourage all employees to support the sustainable use of natural resources, including water conservation, the reduction and beneficial recovery, recycling and reuse of waste, energy conservation, and biodiversity management.

3.2 Human rights

We are committed to upholding human rights in all areas of our operations and throughout our value chain.

Amsons recognizes its responsibility to respect and promote international human rights standards.

We do not condone the following practices and will not knowingly do business with any individual or company that participates in the following:

- Exploitation of children, including child labor;
- Physical punishment or abuse of any kind;
- Violence against employees, involuntary labour, unethical or abusive conduct;
- Discrimination in employment and hiring practices;
- Provision of unsafe working conditions;
- Salary payments (or deductions) that illegally leave the worker below minimum wage; and
- Illegal overtime regulations.

This commitment extends beyond our own operations to include suppliers, subcontractors and other third-party service providers.

If you have reason to believe that Amsons or one of our partners is failing to abide by laws or regulations designed to protect human rights, share your concerns with the Legal and Compliance officer.

Putting the Code into Practice

01

During engagement with one of our supplier's employees working at our site, they inform you that they are paid below the minimum wage. What should you do?

You should report the issue to the Legal and Compliance officer so that the same can be investigated and addressed appropriately. Amsons takes human rights issues seriously and will make every effort to ensure its supply chain does as well.



3.3 Community engagement

Amsons strives to be a trusted corporate citizen and to fulfill its responsibilities to the communities in which it operates.

Amsons seeks to improve the quality of life for the communities around its operations. We do this by contributing through investment and engagement, and building relationships based on mutual respect and trust with all stakeholders in the community.

We demonstrate respect for people and the planet and ask all our employees to consider, when making business decisions, the short- and long-term impacts on the community and the environment.

Political contributions

Amsons as a company strives to be politically neutral. Contributions to political parties, politicians or candidates for office are private matters for our employees. Amson's premises and assets may never be used to raise funds or to campaign for a particular political party or candidate for office. Political donations may not be made in the name of Amsons unless expressly permitted under written local law and applicable Amsons policies and guidelines, which must require transparent and accurate documentation of such contributions and prohibit such donations to be given in exchange for an improper benefit.

Putting the Code into Practice

01

In your capacity as an Amsons employee you are invited to attend an evening gala at which a political party will be featured in the speeches before fund-raising activities get underway. Your gala ticket mentions the topic of the speech and that by purchasing it, the party will benefit. What should you do?

Your attendance at the evening political gala could be viewed as support of the political party by Amsons. You must exercise care in accepting any such invitation and consult with the Legal and Compliance officer before accepting. In any event, if you do attend then it must be in your personal capacity.



Advice, guidance, and reporting

A respectful workplace includes acting with integrity, as well as following the law, our Code of Conduct and Company policies and values.

While working at Amsons you may be confronted with a situation that presents an ethical dilemma. When that happens, do not hesitate to speak up, ask questions about your responsibilities, and report concerns or non-compliant conduct when needed. Always try first to address questions or concerns with your immediate supervisor or others who can help, such as Human Resources, Legal and Compliance, Internal Audit, Internal Control, and Security.

Integrity Line

If you are uncomfortable or unsuccessful in discussing an issue with one of the choices set out above, you should be aware that the Amsons Integrity Line is another alternative to obtain advice or raise a concern in good faith about any situation that you know or suspect violates our Code or the law.

Your report will be received by an Amsons leadership resource who will then cascade the same to the Compliance and investigation personnel, who will deal with your report in a professional manner. Reports and related information will be treated confidentially and shared with only those persons who need to know in relation to safeguarding the interests of the company.

Cooperation with investigations, audits, and internal control activities

Preventing and detecting violations of the Code or the law is taken very seriously at Amsons. Similarly, any potential violation of the Code or the law will be investigated promptly. As such, employees are required to cooperate fully and honestly in any investigation, audit or internal control activity, which includes promptly responding to all information requests. All documents, including but not limited to hard copy, electronic and email files, are the property of the company and may be reviewed from time to time in compliance with applicable data privacy law and in accordance with Amsons policies and directives for purposes of investigations, audits or internal control activities or ensuring compliance with law.

Protection from retaliation and victimization

Amsons does not tolerate retaliation and victimization against any employee who reports a concern in good faith. Individuals who take action against a person for raising a concern or participating in an investigation will be subject to disciplinary action, up to and including termination of employment.



Speak Up

Email: integrityline@amsonsgroup.net

Putting the Code into Practice

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Your supervisor orders you to change an expenses report, which you know to be in breach of Amson's policies and this Code. You're concerned that your supervisor will make your job difficult if you refuse to carry out what she has told you to do. What should you do?

You have identified what may be a serious matter. Normally your supervisor would be the best person to speak to in the first instance. Alternatively, it may be appropriate to raise the matter with your supervisor's manager. Due to your supervisor's involvement, however, reporting through speak up is a good option in this situation.





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