



At DSP, we strive for excellence in realizing our vision as the world's preferred processor of flat steel products. We achieve this by expanding our supply to niche markets while upholding our core values, commitments, and accountability to stakeholders, including customers, clients, suppliers, employees, and shareholders.

Our mission is to provide quality flat steel products that surpass customer expectations by responsibly adding value to hot rolled coil whilst providing **PRIME, ON TIME, EVERY TIME!**

We foster an open and transparent environment, encouraging individuals to feel comfortable asking questions, respectfully disagreeing, and raising concerns. We hold each other accountable for doing what is right even if no one is looking and challenge each other to excel in everything we do.

Our Code of Conduct serves as a guide for our daily business conduct, and it is our collective responsibility to ensure that we are all doing our part to protect Duferco's reputation and interest. By always following our Code, we make it clear that being honest, fair, and principled is our preferred mode of operation.

Thank you for maintaining and supporting the strong ethical culture that defines Duferco and makes it the best provider of flat steel products and a great place to work.

Please continue to apply our Code to your daily activities as we all work together to strive for excellence.

Sincerely,

Signed:

**Ludovico Sanges**  
**Managing Director**  
**Duferco Steel Processing (Pty) Ltd**

# CODE OF CONDUCT

Duferco Steel Processing (DSP) commits to maintain its high reputation for ethical behaviour and fair dealing in the conduct of its business. DSP always operates within the framework of the law and promotes a culture of conducting our business responsibly in a risk-averse, fair, honest, and ethical manner.

Naturally DSP requires that all its employees, agents, service providers, consultants and customers abide by this code of conduct.

Our Code outlines our commitment to the highest levels of business ethics and integrity, and we are all responsible for ethics and compliance. It defines who we are, what we value and how we work.

### KEY ELEMENTS OF THIS CODE:

1. Employee conduct
2. Health and Safety
3. Compliance with Laws and Regulations
4. Environment
5. Supplier / Customer relations
6. Compliance with International Trade Restrictions and Export Controls
7. Code of Ethics
8. Harassment, Discrimination, And Bullying
9. Protecting Personal Information
10. Forced Labour and/or Child Labour
11. Social Responsibility/ Investments

## **1. EMPLOYEE CONDUCT**

DSP Employees receive induction and sign and agree to the DSP code of ethics. Employees are expected to act with integrity, respect each other, maintain confidentiality, and ensure all business dealings comply with all regulatory and supervisory obligations.

As per policy, employees are not to disclose confidential proprietary information, information about employees, service providers, or customers, with their outside communications (including online and social media posts) or give the impression that they are speaking on behalf of DSP, unless they are authorized to do so.

Employees are expected to disclose any conflicts of interest, and to follow the DSP guidelines to receiving / accepting gifts and hospitality.

## **2. HEALTH AND SAFETY**

The Health and Safety of all personnel, contractors or anyone having access to our workplace, is of prime importance and it is for that reason that we are committed to:

- Identifying and eliminating hazards and reduce OH&S risks associated with our activities.
- Ensuring that our suppliers, contractors, and visitors fulfil our health and safety requirements.
- Empowering our employees to act within the framework of this policy.
- Sharing and communicating relevant health and safety information to all interested and affected parties, in an open and transparent manner and making this policy available and accessible to all.
- Ensuring effective consultation and participation of workers, and workers' representatives.

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The company maintains a strong commitment to its employees to provide a safe workplace/environment and to establish programs promoting high standards of health and safety. Consistent with the spirit and intent of this commitment, DSP promotes a culture of co-responsibility for the protection and maintenance of good health in the workplace.

Employees and service providers have an obligation to report to work in a state of mind and condition to ensure that they can safely and effectively perform their duties and the company expects all employees and service providers to honour this obligation.

### 3. COMPLIANCE WITH LAWS AND REGULATIONS

To ensure compliance in one's business dealings with the laws of South Africa, employees, contractors, and suppliers, are required to:

- fulfil all regulatory and supervisory obligations imposed on the company.
- co-operate with relevant regulatory and supervisory bodies.
- avoid false, inaccurate, or mis-leading entries in record.
- ensure that taxation, labour, and social security legislation is upheld.
- ensure one's actions comply with relevant contractual obligations.
- encourage effective and fair competition at all times.
- comply with DSPs' purchasing and tendering procedures and with prescribed levels of authority for sanctioning any relevant expenditure.
- avoid engaging in any illegal or criminal or fraudulent activities.

### 4. ENVIRONMENT

DSP is committed to continued excellence and leadership in protecting the local and global environment and is driven to deal with our responsibility for present and future generations by:

- Taking cognisance of environmental issues in all business strategies and initiatives.
- Adopting a transparent and sustainable environmental practice.
- Assessing the environmental impact of all our processes, materials, products, and waste.
- Ensuring the availability of information and of necessary resources to achieve our environmental objectives and targets.
- Reducing energy consumption and greenhouse gas emissions to the minimum feasible levels.
- Empowering our employees, suppliers, and contractors to act within the framework of this policy.
- Introducing green procurement by considering the environmental impact of products and services.
- Adopting ISO 14001 as only the minimum standard for our Environmental Management System.

❖ **Environmental Declarations:** DSP's environmental declarations can be found on our website at [www.duferco.co.za](http://www.duferco.co.za).

❖ **Group Sustainability Report:** Our Group Sustainability Report is available at the following link: <https://dith.com/dith/responsibility/Sustainability.html>

### 5. SUPPLIER / CUSTOMER RELATIONS

We the management and staff of DSP are committed to:

- Ensure that customer requirements, as well as applicable statutory and regulatory requirements are continually determined, understood, and consistently met.
- Continually improve the quality management system by ensuring that the opportunities and risk that can affect the conformity of our products to requirements are determined and addressed.
- Enhance customer satisfaction by building mutually beneficial business relationships and effectively deal with suggestions and complaints.

### **6. COMPLIANCE WITH INTERNATIONAL TRADE RESTRICTIONS AND EXPORT CONTROLS**

DSP trades with integrity and we commit ourselves to the various international trade restrictions and export controls in the countries where we do business. These laws vary widely around the world and failure to comply with these laws can seriously impact our business and reputation, lead to significant fines, and can even result in the loss of our export privileges.

We are committed to act in compliance with these laws and to behave in a fair, honest, and ethical manner in all our business dealings and relationships across the world.

### **7. CODE OF ETHICS**

It is the policy of DSP to maintain its high reputation for ethical behaviour and fair dealing in the conduct of its business. DSP's Code of ethics Policy (PO-HR-013) provides more detail about the code of ethics.

In many cases decisions as to what is ethical, or fair are clear-cut and will be obvious to any reasonable person. In some situations, however, there may be circumstances where an element of doubt or ambiguity arises. To help in those circumstances and to protect and guide individual employees of DSP, it is necessary to have a written code of ethics.

It is not possible to provide for every situation in the code of ethics. If there is doubt about the probity (honesty) of any particular situation, the Manager of the company's Compliance Department must be consulted about the situation by the individual concerned.

#### **Principles of the Code of Ethics:**

The guiding principles of the Code of Ethics can be summarized under five headings:

- Integrity
- Confidentiality
- Legality
- Fraud Prevention
- Disclosure of interest

#### **DSP's Confidential Whistle Blower hotline**

DSP's confidential Whistle Blower hotline is operated by an independent third party with specially trained operators and is available 24 hours. You may report anonymously, where permitted by law, but keep in mind that anonymous reports are more difficult to investigate. Identifying yourself may expedite and ensure thorough review of your concern. We will address your concern or question promptly, and your identity will be fully kept confidential, as far as permitted legally.

DSP's Confidential Whistle Blower hotline can be reached by dialling **0800 000 632**.

### **8. HARASSMENT, DISCRIMINATION, AND BULLYING**

Duferco Steel Processing prohibits discrimination, harassment and bullying in any form – verbal, physical, visual, or otherwise. If you believe you have been bullied, harassed, victimised, or discriminated against by anyone at DSP, we strongly encourage you to immediately report the incident. Internally incidents can be reported by using the company grievance process, reporting to the Whistle Blower hotline, or directly to supervisors, HR manager or ICC manager.

Customers and Service Providers can direct their report to the Whistle Blower line, or a senior manager.

### **9. PROTECTING PERSONAL INFORMATION**

We strive to implement reasonable and appropriate practices in our collection, use, and sharing of personal information about individuals.

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These principles and practices ensure that personal information:

- Can only be used to support legitimate business purposes and are only available to authorized personnel.
- Risks are identified and safeguards against these risks are in place.

Access to this information is also subject to the Promotion of Access to Information Act.

### **10.FORCED LABOUR AND/OR CHILD LABOUR**

DSP will not use any form of forced labour where people are forced to work against their will, including forced labour to work off a debt, prison labour or human trafficking.

In addition, DSP will also not use child labour. In this content “Child” means a person younger than 15 years old as defined in the South African Basic Conditions of Employment Act. It is a criminal offence to employ a child younger than 15, except in the performing arts with a permit from the Department of Labour. Children aged 15 to 18 may also not be employed to do work inappropriate for their age or do work that place them at risk. For this reason, it is the policy of DSP to not employ persons under the age of 18 years.

### **11.SOCIAL RESPONSIBILITY/INVESTMENT**

Duferco Steel Processing (DSP) is committed to socio-economic upliftment and development within the community in which they operate through their Corporate Social Responsibility and Investment program according to the Broad Based Black Economic Empowerment Act as well as the King IV Reports on Good Corporate Governance.

Sponsorships and donations are key and vital components of the company’s strategic socio-economic responsibility to the previously disadvantaged community and is a valuable tool and project to prove the company’s mission of active participation to sustainable community development for the vulnerable and the previously disadvantaged.

