P.O. Box 72501 Parkview South Africa, 2122



## TRANSNET CODE OF ETHICS COMMITMENT STATEMENT

- 1. The purpose of this Statement is to affirm our ethical principles and standards of acceptable behaviour. These apply to all Non-Executive Directors, employees, suppliers, service providers, and customers, in fulfilling their responsibilities and obligations to the Company. We are committed to upholding the founding provisions of the Constitution of the Republic of South Africa, 1996 and give effect to its guiding imperative.
- 2. We believe that strong and effective governance is fundamental to the sustainability of our business and the creation of enduring value for all our stakeholders. We therefore remain committed to the highest standards of corporate governance, ethical conduct and regulatory compliance.
- 3. Ethics refers to the process of distinguishing between right and wrong in our engagements with others and influences our decision making.
- 4. To this end, these are the ethical standards Transnet employees and Non-Executive Directors will be expected to uphold at all times, without exception:
  - 4.1 To behave in a manner that is exemplary when representing the Company, both within and outside the Company, and to act with respect, honesty and integrity in all interactions.
  - 4.2 To have regard to the needs, interests and expectations of all employees, its customers and the general public.
  - 4.3 To foster constructive relationships with labour and all our customers.
  - 4.4 To remain a good corporate citizen, to protect the environment, and promote sustainable development.
  - 4.5 To refrain from engaging in practices that could lead to potential and/or perceived conflict of interest, cause damage and/or loss to Transnet.
  - 4.6 To proactively manage, monitor and report on all transactions involving domestic and foreign influential persons in line with the Company policies and procedures.
  - 4.7 To exercise our duties with care, skill and diligence.
  - 4.8 To protect and maintain the prescribed standards of confidentiality of information and protection of whistle blowers.
  - 4.9 To report any acts of fraud, theft, corruption, any other economic crime, and unethical conduct or activities in line with ethics related policies and procedures. These include, but not limited to, the Transnet Anti-Fraud and Corruption, Whistle Blowing, and No Gifts and Hospitality Policies.











- 5. Transnet is committed to giving effect to the continuous update and improvement of the following policies:
  - 5.2 Declaration of Interests and Related Party Disclosures Policy for Employees;
  - 5.3 Declaration of Interests and Related Party Disclosures Policy for Directors;
  - 5.4 Security Screening and Vetting Policy;
  - 5.5 Whistleblowing Policy;
  - 5.6 Lifestyle Audit Policy;
  - 5.7 Domestic Prominent Influential Persons and Foreign Prominent Public Officials Policy;
  - 5.8 Anti-Fraud and Corruption policy;
  - 5.9 Anti-Harassment, Discrimination and Workplace Bullying Policy;
  - 5.10 Information Classification Policy;
  - 5.11 No Gifts and Hospitality Policy;
  - 5.12 Supply Chain Management Policy; and
  - 5.13 Policy on Non-Executive Directorships and Trusteeship for Transnet Employees.
- A Transnet Tip-offs Anonymous/Ethics Hotline (0800 003 056) has been established for reporting any suspected violations. Reports provided to the Hotline are treated with complete confidentiality.

**Approved by:** Board of Directors **Approval Date:** 31 May 2023

**Executive Sponsor:** 

Portia Derby
Group Chief, Executive

Date: 02/06/2023







