



Forecourt Equipment and Services (Pty) Ltd Reg. No 2014/177870/07  
Cape Town P O Box 543 Maitland 7404; 5 Hawkins Ave, Epping 7460 Tel: +27 (0)21 511 4053

## **Ethics Policy Document**

### **Introduction**

FES Brand Marketing strives through the efforts of its employees to build a reputation of being a trusted company that conducts its business with integrity and in compliance with the laws and regulations under which we operate.

This Code of Conduct provides guidance for ethical business conduct in a number of areas that FES Brand Marketing expects all of its employees to adhere to.

FES Brand Marketing's Board of Directors and Executive Management have approved the Code and comply with and fully support the Code in the execution of their respective duties. Furthermore each Manager is responsible for ensuring that all of their respective employees have been adequately introduced to it, to be able to comply with the Code of Conduct. The Management is further responsible for training, monitoring and enforcing compliance with the Code of Conduct.

We believe that all of our stakeholders are entitled to know about our business practices. The "Code of Conduct for the FES Brand Marketing" is available to the public if and when requested.

### **Discrimination**

FES Brand Marketing does not tolerate discrimination whether it is based on a person's race, colour, religion, origin, disability, age, gender, sexual orientation, union membership or political affiliation. Laws and regulations governing the equality of men and women shall be observed. FES Brand Marketing also abides by all laws including those prohibiting child or forced labour. In places where there is no such law, we do not condone child labour or forced labour.

### **Conflict of Interest**

Conflicts of interest between FES Brand Marketing's interests and employees should be avoided.

### **Proprietary Information**

All data and information, whether electronic, hardcopy or verbal, and regardless of whether it is related to internal or external issues, shall be handled confidentially. Confidentiality agreements must be signed in advance with third parties if the exchange of proprietary information is unavoidable as part of any negotiation or interaction.



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## **Fair Competition**

FES Brand Marketing supports fair and vigorous competition and expects all employees to comply with all applicable anti-trust and competition laws.

No confidential information may be exchanged on prices and pending price changes or customer/supplier relationships in discussions with competitors. Limited exceptions apply if information is disclosed within the scope of a particular project, e.g. a planned acquisition or the establishment of a joint venture, and only after a confidentiality agreement has been signed in advance.

## **Product and Service Quality**

Safety, quality and efficacy are core considerations for FES Brand Marketing. Every stage of the research, development, manufacture, storage and distribution of our products must be conducted in accordance with all relevant applicable internal and external standards, laws and regulations.

## **Safety and Environmental Protection**

FES Brand Marketing follows all applicable internal and external safety and environmental laws and regulations.

## **Communications and Disclosures**

All our communications, through whatever channel, must be fair, accurate, timely and appropriately authorised. All employees must be mindful of situations in which they may be perceived to be communicating on the Company's behalf.

## **Gifts and Hospitality**

FES Brand Marketing persuades through prices, performance, quality and suitability of its products and services. No personal advantages may be requested, assumed, offered or granted in return for a preferential treatment in connection with the negotiation, or facilitation payment (loans, services) or other privileges shall be granted in placement or execution of an order. As a rule, no personal advantages may be offered or granted to employees. As a rule, no gifts or hospitality or accepted if FES Brand Marketing's interests are harmed or if the professional impartiality of the employee could be placed at risk, whether in actuality or appearance. Exceptions apply only with generally customary occasional or advertising gifts and with gifts which correspond to custom and politeness in a country.



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## **Implementation**

FES Brand Marketing shall adopt the appropriate resolutions to fully implement the Code of Conduct. Every FES Brand Marketing employee shall be issued or shall have access to a copy of the Code of Conduct. The Management shall incorporate the Code of Conduct into employee training. The Management is further responsible for monitoring and enforcing compliance with the Code of Conduct, and, if necessary, for implementing special monitoring programs.

## **Reporting Concerns**

Violations of this Code of Conduct will not be tolerated. FES Brand Marketing will enforce compliance with the aforesaid rules and regulations. Breaches may result in warning notices, with the enforcement of compensation claims or termination of the employment relationship. Employees should report imminent violations or breaches which have already occurred to their immediate supervisor or line manager. Alternatively the Corporate Legal Department or the Internal Audit Department may be contacted directly particularly if the violation involves Management. Any employee who reports a potential violation will be protected from retaliation and their identity will be treated anonymously. This protection also extends to anyone giving information in relation to an investigation.

## **Contact Details:**

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