



Code of Ethics and Business Conduct

June 2018

1. Introduction

DPD Laser is a responsible business and the intention of this document is to set out clear standards of behaviour for everyone in our organisation.

The aim of the document is to be preventative in that it should help you to understand potentially critical or dangerous situations where acting inappropriately could compromise yourself and the business.

This code of ethics and business conduct is consistent with Laser's core values of:

- Authenticity – we will be straightforward, honest, respectful and transparent.
- Ambition – our nature is entrepreneurial and we are not afraid to fail in the pursuit of improvement.
- Empowerment – we empower people to do their best and we embrace diversity.

Management teams across the divisions have a specific role to play in setting an example, ensuring that this policy is well communicated, understood and applied throughout our organisation.

If you have any questions or concerns about what constitutes good and proper conduct you should immediately raise the issue with your manager, another senior manager / director or use the "Beheard" hotline.

Happy reading!

Iain D Johnson
Chief Executive Officer

2. Why introduce a code of ethics and business conduct?

Ethical practice is a set of behaviours that form part of the trust that we as a company have with our employees, partners, customers and other stakeholders. It is also about ensuring that DPD Laser fully complies with all applicable laws and regulations.

Ethical practice is about ensuring that regardless of where and how people interact with DPD Laser, they will be treated in the same professional way which is consistent with our values. Anything less than this would impact our reputation and damage our ability to do business and serve our customers.

The purpose of this code of ethics and business conduct is therefore to help all DPD Laser employees to live our values and act responsibly, ethically and in the best interests of all key stakeholders.

Each operating division is responsible for managing ethical practice within their businesses on a day to day basis.

3. Being a responsible employer

Responsible Employment

DPD Laser currently employs c.2,000 people. It is vital that we treat all our people fairly, respecting human rights and equal opportunities whilst maximising the talent, capability and performance of our people to benefit our business and ultimately the customer.

Vision and strategy

In all our businesses, the organisation vision and strategy should be clearly communicated to our people and everyone should understand how their role and objectives relate to it. Engaging with our people in this way so that they understand the vital role they play is key.

Employee views

DPD Laser must listen and respond to views and opinions. Our people will be involved in decisions that affect them whether as individuals or through consultation with representatives.

Diversity

All our businesses will operate an equal opportunities policy that prevents negative discrimination during any aspect of recruitment or employment on grounds of

gender, religion or belief, race, creed, age, disability, sexual orientation, ethnic origin or marital status. We aim to create an environment in which all our employees can develop their full potential. Valuing and promoting diversity across all our businesses is an essential part of achieving that goal.

Health and safety

DPD Laser will do its utmost to provide a safe and healthy work environment, ensuring that all legislation and regulation regarding health and safety is adhered to.

Performance and reward

DPD Laser will ensure that there is a clear process for setting performance standards and expectations and for measuring and rewarding performance.

Political contributions

DPD Laser will not make political contributions unless approved by the Board of Directors. Political contributions can include cash, gifts, sponsorships, donations or benefits in kind and no DPD Laser employee should knowingly make a political contribution on behalf of the organisation.

Company records

All books and records will be kept in accordance with applicable laws and according to proper accounting standards, fully reflecting receipts and expenditures. This is to ensure that the financial information we use within the business or for external publication is accurate and reliable.

4. Being a responsible employee

Appropriate use of company resources

All of our people must use company resources in a responsible and ethical manner. This means adhering to a high standard of integrity when using company resources.

Intellectual property

It is DPD Laser's policy to establish, protect and maintain all commercial intellectual property rights and all employees must take steps to safeguard these. Commercially sensitive information must not be disclosed under any circumstances. Theft and misuse of trade secrets or proprietary information is strictly prohibited. Likewise, DPD Laser employees must always respect the intellectual property of 3rd parties.

All inventions, ideas and solutions devised whilst in employment with DPD Laser are the intellectual property of the company. Whilst DPD Laser actively encourages ideas and creative thinking in order to improve the customer experience, it is vital that our people understand that all work is the intellectual property of DPD Laser and the company has the sole ownership and use of it.

These obligations apply to all employees of DPD Laser, including those who leave the company.

Conflicts of interest

You should not undertake any activities, have financial interests or relationships outside of your role which could represent a possible conflict of interest. It is recognised that our people may undertake legitimate financial and business activities in their own time, but these should not conflict with or damage the reputation of DPD Laser. Examples of conflicts of interest include, but are not limited to:

- preferential recruitment or promotion of a partner, relative or close personal friend without prior approval of a more senior manager following an open and non-discriminatory selection process;
- using the DPD Laser brand or company resources for personal interests;
- directing company business to a friend or family member without going through a proper purchasing process;
- advising competitors.

Doing Business

In the course of doing business with customers, suppliers and other third parties, we must behave with integrity and professionalism and in a manner which is consistent with our values.

Customers

Customers are our main priority and all dealings with customers must be undertaken with honesty, integrity and openness. We will communicate in an accurate and truthful way to customers whether in advertising, marketing, PR or via direct communication. A promise made by any employee is a promise made by DPD Laser and must be treated as such. Customers must not be miss-sold products that are unsuitable for their business and contracts made with customers must be honoured. Customer data will always be treated with sensitivity and respect and must not be used for personal gain. All data is handled in a way that meets the requirements of data protection laws in the countries in which we operate.

Suppliers

We will seek mutually beneficial relationships with suppliers and recognise our position as a role model to SME businesses. As such, we will settle accounts promptly and efficiently. Contracts agreed with suppliers must be honoured. All suppliers will be expected to adhere to DPD Laser's code of ethics and business conduct.

Gifts and improper payments

Gifts of money, goods, services or other favours must not be asked for or accepted. Small tokens (e.g. branded corporate gifts) and reasonable hospitality (e.g. a business related dinner) may be accepted as long as they do not place you under any obligation and will not be misconstrued. Anything received that falls outside of this must be politely refused unless specifically authorised by the CEO.

Likewise the giving of gifts or hospitality must be strictly within a professional context and be reasonable in nature. No DPD Laser employee should ever seek to influence a decision or compromise our own decisions with gifts, meals or entertainment. The giving of gifts or hospitality that exceeds something of a token nature must be pre-authorised by the CEO.

Importantly it needs to be noted that under no circumstances must any DPD Laser employee make a facilitation payment. Facilitation payments are unofficial payments of small amounts of money which are intended to facilitate the smooth running of processes which the payer expects. These are strictly prohibited.

Bribery, corruption and fraud

Under all circumstances DPD Laser prohibits all forms of corruption and as individuals we must be alert to spotting and preventing corruption.

The terms bribery, corruption and fraud are often used interchangeably but have different legal meanings in different jurisdictions. In general, bribery involves one person offering a financial or other advantage to another in return for some improper favour or advantage; fraud involves criminal deception by someone designed to gain a financial advantage; and corruption refers to a wide range of different corrupt activities, such as extortion, dishonesty and abuse of office. Corruption may also include activities which would also amount to fraud or bribery.

DPD Laser has a zero tolerance approach to all forms of bribery, corruption and fraud. We are committed to acting professionally, fairly and with the highest levels of integrity in all of our business dealings.

Compliance with laws

All our dealings must be in compliance with relevant legislation and local and international law. DPD Laser cannot accept circumstances where any employee allows a situation to arise where the company may not be in full compliance with all applicable laws.

Expenses

Policies and forms for the claiming of expenses will be managed locally within the divisions. Any attempt to claim expenses for which individuals are not entitled will be thoroughly investigated and deliberate actions will be treated as fraud.

Preventing money laundering

People who are involved in criminal activity, such as bribery, fraud or trafficking narcotics may attempt to launder money through apparently legitimate businesses in order to use the funds from their criminal activity and reduce suspicion. Under law, acceptance or processing of money gained through criminal activity is illegal.

DPD Laser will deal only with reputable customers who are involved in legitimate business activities and whose funds are derived from legitimate sources. Our people are asked to raise any concerns if a customer's business appears to be suspicious.

Examples of unusual payment practices that might indicate money laundering include, but are not limited to:

- multiple money orders or travellers cheques;
- large amounts of cash;
- a cheque on behalf of a customer from an unknown third party; and
- reluctance to provide complete information or provision of suspicious information.

If you become suspicious, you should raise your concern immediately with your line manager or any senior manager.

Competition Law

Competition law prohibits anti-competitive behaviour such as agreements between competitors to fix prices, limit supplies or act in any other way which unnaturally distorts the free market. DPD Laser is committed to free and open competition and we will compete vigorously, but honestly, while complying with all relevant competition and anti-trust laws, wherever we do business.

All employees should be familiar with competition law and not act in any way which could be interpreted as being anti-competitive.

Privacy

Respect for privacy is both a personal and a company responsibility. DPD Laser commits to protecting any personal information it obtains through the course of doing business and adhering to all applicable data protection legislation.

Specifically, our people must:

- protect customer data and should not share it with any third parties;
- protect personal information relating to co-workers, suppliers or business partners;
- keep any such information secure.

When dealing with personal information, you should ensure business decisions are based on sound judgement and not personal information that could result in suggested discrimination. Please read and familiarise yourself with local data protection policies and, if unclear, speak to your manager to ascertain how it applies to you in your role.

5. How to use this code of ethics and business conduct

Common sense and good judgement should be applied at all times. If having read this code you have any questions then you can:

- Speak to your immediate line manager;
- Speak to your divisional HR Officer;
- Speak to the Laser Group HR Officer
- Speak to any Executive.

If you become aware, or believe that any of the principles outlined in this code have been breached you should ask yourself:

- Is the act in question legal?
- Does it comply with the code?
- Does it expose DPD Laser to any risks, and if so, of what kind?
- What would be the impact to the company of this act if it was published in the media?

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If having asked these questions you conclude that the act or behaviour could constitute a breach of the code it is your duty to promptly notify your line manager or an Executive of DPD Laser.

If it is your preference to remain anonymous / private in reporting acts or behaviour that could be considered a breach of the code then you can use the "Be heard" whistle blowing hotline which can be accessed via the following methods:

- E-mail: (dawnwing@beheard.co.za / timefreight@beheard.co.za)
- Freecall: 0800 000112
- SMS: 44666

This hotline is operational 24/7 and covers all South African languages. Note that in using the whistle-blowing system in good faith you are not at risk of any penalty whatsoever, even if the facts prove to be inaccurate or do not result in any action being taken.