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Better
Every Day

CODE OF CONDUCT

Montego
—Pet Nutrition—

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1. PURPOSE

This Code of Conduct sets and enforces the Montego Pet Nutrition *Operating Principles* by requiring minimum standards of behaviour in key areas.

2. PRINCIPLES

At Montego Pet Nutrition, our employees play a crucial role in upholding our *Core Principles*. Employees are expected to internalise and act upon these Principles, ensuring that our customers receive the best possible service and that our products are of the highest quality.

Remember, it's not just about what we do but how we do it that truly sets us apart.

- Avoid any behaviour that could harm or jeopardise the reputation of Montego Pet Nutrition.
- Act with honesty and integrity, and never engage in illegal activities.
- Always prioritise the interests of Montego Pet Nutrition over your interests or those of others.

We encourage and support our employees' engagement in professional development and community activities if these activities align with this Policy.

We aim to balance providing opportunities for our employees to pursue outside professional development for compensation and minimising our exposure to legal, financial, and operational risks that may arise.

3. SCOPE

This Policy applies to all employees and aspects of Montego Pet Nutrition's organisational functions. Every employee is responsible for making the right choices, and this responsibility cannot be delegated to others.

4. DEFINITIONS / ACRONYMS

TERM	DEFINITION
Bribery	Bribery occurs when someone offers, pays, seeks, or accepts a payment, gift, or favour to influence an official outcome improperly. Bribery and corruption can be direct or indirect through third parties.
Confidential information	Any information that is not or is not yet public information.
Close personal relationship	A relationship between an employee and a relative, a financially dependent person, a close friend, a <i>de facto</i> partner, or any person with whom there is currently or has been an intimate relationship. This does not include a working relationship due to ordinary collegiate academic collaboration, where the colleagues are not relatives, financially dependent, or <i>de facto</i> or intimate partners.

Conflict of Commitment	This occurs when one interest of an employee, which may or may not be a private interest or non-Montego Pet Nutrition interest, may harm or interfere with the productivity or involvement of that employee in aspects of their Montego responsibilities. It may concern the employees' distribution of efforts between employment obligations to Montego Pet Nutrition and outside activities.
Conflict of Interest	The term 'Conflict of Interest' refers to a situation where a conflict arises for an individual between two (2) competing interests. These are often, but not exclusively, interests of public duty versus private interests. This refers to a reasonably perceived, potential, or actual Conflict of Interest. Conflicts of Interest can involve the employee's financial or non-financial interests and those of a business partner or associate, family member, friend, or person who has had a close personal relationship with the employee.
Conflicts of Interest in work application	This includes an actual, perceived, or potential Conflict of Interest which may compromise, or have the appearance of compromising, an employee's ethical behaviour and professional judgment in conducting and reporting that research. Such conflicts must be appropriately managed as they can compromise the validity and integrity of the research process and undermine the public.
Conjoint Appointee	Usually, a service provider who is and who is by their employment contract with Montego Pet Nutrition has the status of a Manager.
Domestic Partner	An employee and their partner must either be married to one another or, in the absence of marriage, be each other's sole domestic partner, be at least eighteen (18) years of age, be financially responsible for each other's welfare or at least economically interdependent, not be legally married to another person and not be related to each other in a way that would prohibit marriage.
Employment Equity	Employment Equity can be defined as measures designed to ensure that suitably qualified persons from the designated group have equal employment opportunities and are equitably represented in all occupational levels and categories in the workplace of a designated employer.
External party	A company, association, person, or organisation other than Montego Pet Nutrition and Montego's controlled entities.
Family	An employee's spouse or life partner or the employee's parent, adoptive parent, grandparent, child, adopted child, grandchild, or sibling.

Financial interest	Any employment, business activity or other right, claim, title, or legal share in something with a monetary or equivalent value. Examples of financial interest include but are not limited to shares, share options, dividends, and the right to receive remuneration or other benefits such as salaries, directors' fees, consulting fees, allowances, and discounts.
Minor Miscellaneous Income	Income derived from work, or an activity undertaken by an employee which relates to the employee's work, and which might reasonably be construed as "Private Practices". However, the job or activity either – is a "one-off" activity which takes no more than one (1) day or, in any given year, involves a total of no more than forty (40) hours of the employee's time and generates remuneration for the employee of no more than one thousand rand (ZAR 1 000.00).
Montego Pet Nutrition	The term Montego Pet Nutrition includes Montego-controlled entities.
Non-financial interest	Any community or other voluntary activity or involvement, including with a sporting club, church, political party or other formal or informal association or group.
Paid Outside Work (POW)	Work or development activities that an employee of Montego Pet Nutrition undertakes in their private capacity for remuneration, which is outside their normal duties (in this regard, reference should be made to the employee's engagement profile or position description), where Montego Pet Nutrition is not a party to the contract under which the work or development is undertaken. For example, this might include a consultancy or commissioning a particular piece of work.
Relative	One related by blood or legal connection to an employee of Montego Pet Nutrition.
Risk	Exposure to the possibility of something happening that will impact Montego Pet Nutrition, our stakeholders' organisational objectives, and the various <i>Strategic Plans</i> of Montego Pet Nutrition. For this procedure, "risk" includes, but is not limited to, risks to Montego Pet Nutrition's reputation, finances, delivery of quality services, people, security, organisational culture, operations, and legal liability. An <i>unacceptable risk</i> refers to an activity that contravenes this Policy.

5. PAID OUTSIDE WORK (POW)

All employees are required to devote their working hours to Montego Pet Nutrition, as per the Terms and Conditions of their Appointment and Job Profile. Employees who wish to undertake *Paid Outside Work (POW)* must obtain prior written approval from the Corporate Services Director.

To obtain approval for *POW*, an employee must follow these steps:

- Declare the *Paid Outside Work* in writing to Management.
- Discuss any potential or actual conflicts of interest or commitment with the Human Resources Manager, who shall consult with the Corporate Services Director.
- Obtain prior written approval from the Corporate Services Director.
- Obtain permission to engage in continuing *Paid Outside Work* (such as a continuing consultancy) annually, including fully disclosing the proposed commitments for the coming year.
- Do not use their Montego Pet Nutrition title/position when seeking to attract or when performing work for an external entity to avoid any implication that may arise if the employee is performing work on behalf of Montego Pet Nutrition.
- Continue to comply with all obligations as an employee of Montego Pet Nutrition, including obligations concerning Montego Pet Nutrition's *Intellectual Property, Conflict of Interest Procedure, Confidentiality* of Montego Pet Nutrition information, and comply with their obligations under *South African Taxation Law*.

To undertake any form of *Paid Outside Work*, the work must be unrelated to the employee's professional/employment role, should not require the use of any Montego Pet Nutrition facilities or equipment, and the employee should not be involved in employing another Montego Pet Nutrition employee who reports to them directly or indirectly.

It is essential to ensure that the interests of Montego Pet Nutrition are protected, and an employee may not engage in any private work or professional work for a third party (paid/voluntary) that conflicts with the interests of Montego Pet Nutrition or the work performance of their obligations as an employee.

6. FAMILIES AND RELATIVES

Employment and career development decisions are made following *Objective and Impartial Principles*.

Discrimination in employment opportunities based on familial or partnership ties is strictly prohibited. However, we may consider immediate family members or partners of employees for employment or consultancy if they meet the requirements of the position in terms of qualifications, skills, and experience and if there is no direct or indirect reporting relationship between the employee and their relative or partner.

If a relative is being considered for a position, any member of the *Selection Committee* related to the candidate will not be a part of the *Selection Process*.

These *Principles of Fair Employment* will apply to all aspects of employment, including compensation, promotions, and transfers. These rules also apply if a relationship develops between an employee and a relative or partner after the employee joins Montego Pet Nutrition.

7. EQUAL OPPORTUNITY

The primary objective of this Policy is to ensure that Montego Pet Nutrition is an equitable and inclusive organisation that fosters the employment and career progression of individuals from diverse backgrounds, including black people, women, and persons with disabilities.

The Policy is rooted in the principles of the *Employment Equity Act* and recognises the need for transformation and affirmative action in the workplace.

The Policy aims to eliminate any barriers and discrimination that may impede the success of these groups. It guides the development and revision of Montego Pet Nutrition's *Employment Equity Plan*, ensuring that the company represents the demographics of the provincial workforce. Additionally, the Policy safeguards all employees from mistreatment and harassment, creating a safe and respectful work environment.

By promoting diversity and inclusion, Montego Pet Nutrition aims to foster a culture that values and leverages its employees' unique perspectives and experiences. The organisation is committed to implementing this Policy effectively and continuously improving its practices to create a fair and inclusive workplace.

8. SOLICITATION

Solicitation includes requesting money, support, or participation for products, groups, organisations or causes unrelated to our company.

Employees may only solicit from colleagues under the following conditions:

- It should not disrupt work.
- Solicitation should occur during non-working hours.
- Employees must respect colleagues' boundaries and preferences.
- Lending money from colleagues is prohibited.

Restrictions for Non-Employees:

Non-employees are prohibited from soliciting on Company premises unless authorised by Senior Management. Former employees cannot return to the Company property to solicit from our customers or current employees.

9. BRIBERY AND CORRUPTION

Bribery is the act of offering, paying, seeking, or accepting a payment, gift, or favour to improperly influence an official outcome. Such practices can be direct or indirect through third parties and are strictly prohibited for Montego Pet Nutrition employees.

It is incumbent upon each employee to conduct themselves in a manner consistent with the *Anti-bribery and Corruption Laws* to which Montego Pet Nutrition is subject. The Company expects its employees to refrain from offering, seeking, or accepting any personal payment, gift, or favour to gain any business advantage or favourable treatment.

It is essential to recognise that any violation of this Policy will result in severe consequences, including disciplinary action, dismissal, legal proceedings, and imprisonment. Therefore, employees must inform Montego Pet Nutrition's management if they suspect or know of any corrupt practices within the Company or with any party (authority or individual) Montego Pet Nutrition does business with.

By upholding these standards, Montego Pet Nutrition employees will foster a culture of transparency, integrity, and ethical behaviour consistent with the company's values and mission.

10. CONFIDENTIAL INFORMATION

Confidential information comprises any data that is not yet publicly available. At Montego Pet Nutrition, employees are strictly prohibited from disclosing confidential information or allowing its disclosure unless authorised by Management or required by law. This obligation is binding even after an employee's termination.

Montego Pet Nutrition is committed to upholding the *Protection of Personal Information Act (POPI Act)* (refer to the *POPIA Policy*):

- Employees must exercise utmost care to prevent inadvertent disclosure of confidential information, particularly when storing or transmitting it. Montego Pet Nutrition acknowledges that third parties have a similar stake in safeguarding confidential information. If third parties share confidential information with Montego Pet Nutrition, it will be treated with the same degree of caution as Montego Pet Nutrition's confidential information.
- Employees must safeguard confidential information obtained during their previous employment.

11. FRAUD, PROTECTION OF AUTHORITIES' ASSETS AND ACCOUNTING

Employees must refrain from engaging in fraudulent or dishonest conduct concerning the property, assets, or financial reporting and accounting of Montego Pet Nutrition or any third party. Such behaviour not only carries the possibility of disciplinary sanctions but can also result in criminal charges. The financial records of Montego Pet Nutrition serve as the foundation for the Management of the Company's business and the fulfilment of its obligations to various stakeholders. Therefore, it is incumbent upon all employees to ensure that financial records are accurate and comply with Montego Pet Nutrition's *Accounting Standards*.

All employees must be vigilant in their efforts to safeguard and make proper use of Montego Pet Nutrition's property. Tangible and intangible assets, including trademarks, confidential or proprietary information, and information systems, are all encompassed by the obligations of employees to protect against loss, damage, misuse, theft, fraud, embezzlement, and destruction. To the extent authorised by applicable law, Montego Pet Nutrition reserves the right to monitor and inspect employee usage of company assets, including email, data, and files kept on Montego Pet Nutrition's network terminals.

Regarding gifts, meals, and entertainment, employees must avoid the appearance of impropriety by not accepting or offering anything that could improperly influence business relationships.

Employees may only offer or accept reasonable meals and symbolic gifts appropriate to the circumstances.

If an employee receives a gift, they must immediately submit it to their Manager or the Human Resources Manager.

Employees should consult the Policy that applies to their area for further guidance on gifts, meals, and entertainment.

12. WORKPLACE VIOLENCE

This Policy defines violence as the intentional and wrongful abuse or destruction of individuals, oneself, or property. Intimidation is described as an act that could reasonably cause another person to fear for their safety and the safety of others. Threats of violence, whether verbal or non-verbal, refer to the communication of an intent to inflict physical or other harm on any person or property.

Montego Pet Nutrition is committed to maintaining a workplace free from harassment, coercion, intimidation, threats, and violence for all employees, including interns, contracted employees, visitors, customers, and guests. Montego Pet Nutrition strives to provide all employees with a safe and secure working environment. To this end, the company has a zero-tolerance Policy for intimidation, threats, and acts of violence, whether with or without the presence of a weapon.

Workplace violence encompasses not just physical contact intended to cause harm, but also verbal or written statements designed to frighten, coerce, or threaten employees. It is assessed by determining whether a reasonable person would interpret such behaviour as evidence of intent to harm individuals. Any individual who violates this Policy may be removed from Company property, suspended with pay, and subject to disciplinary action, up to and including termination.

Under this Policy, all employees are protected from retaliation for filing a complaint or grievance or cooperating in an investigation. Employees who have experienced violence, anticipate violence, or know of potential violence against others are encouraged to notify an appropriate Manager and Human Resources immediately. This will assist Montego Pet Nutrition in ensuring a safe and violence-free work environment for all employees.

13. INCARCERATION, ARREST AND CRIMINAL RECORDS

Montego Pet Nutrition upholds the fundamental principle of "innocent until proven guilty". Nevertheless, we reserve the right to address an employee's absence, including termination, as necessary.

If an employee of Montego Pet Nutrition is incarcerated, whether pre- or post-conviction, our decision-making process will be predicated on several factors:

- The duration of the incarceration.
- The temporary or permanent nature of the absence.
- The practicality of utilising a temporary worker.
- The status of the trust relationship between the parties and
- Whether we may rely on the *Labour Relations Act (LRA) Schedule 8 Code of Good Practice: Dismissal*.
 - Concerning the latter, in most cases, we will adhere to the *Code of Good Practice*.
- Additionally, incarcerated employees are placed on *Unpaid Leave* under the "No-Work-No-Pay" Principle.

Incarcerated employees must inform the Human Resources Department of any arrests and submit all relevant documentation, including a *Police Report*. Failure to do so may lead to *Disciplinary Action* for Gross Dishonesty or Misrepresentation. Suppose an incarcerated employee is dealing with health or injury matters. In that case, an opportunity will be provided for them to state their case (*Audi Alteram Partem*), either in written or verbal form, through a representative.

14. CRIMINAL RECORDS

The *Disciplinary Code* of Montego Pet Nutrition states that any employee convicted of a *Criminal Offence* is subject to *Dismissal*.

However, there are two (2) situations where further consideration is needed:

- If an employee is convicted of an offence during their employment, we will evaluate the degree to which the offence relates to their position and how it has affected the Company's reputation before determining their employment future. For instance, if a Driver is convicted of *drunk driving* or an employee in the Finance Department is convicted of *fraud or misappropriation of funds*, their future with the Company will be uncertain.
- If an employee has a *Criminal Record* before being hired but did not reveal it during the *Recruitment Process*, we will investigate whether they lied or misrepresented themselves. We will also assess how the offence pertains to the employee's position in the Company.
- It's worth noting that some arrests may not result in a *Criminal Record*, such as shoplifting, possessing a small number of illegal drugs for personal use, speeding, etc. If an employee is charged, tried, and convicted of a crime but not sent to prison, we will still investigate the situation before making any decisions.

15. QUERIES

Please contact your Human Resources Representative if you have questions or need help understanding this Policy.