

## Lewis Group Code of Ethical Conduct (“the Code”)

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The Lewis Group Limited (“Lewis”) and its Board of Directors are committed to the highest standards of ethical conduct and compliance with the laws of South Africa and the countries that the group trades in.

This code of ethical conduct has been approved by the Board of Lewis Group Limited and will be periodically reviewed and changes implemented to its content as circumstances demand.

The Lewis Group Limited (“Lewis”) requires that all directors and employees of Lewis, its subsidiaries and affiliates abide by the fundamental principles of ethical conduct listed here and conducting themselves in line with this code.

1. **Obeying the law** – We respect and obey the laws, rules and regulations applying to our business globally. We expect compliance from our stakeholders with our company rules, policies and procedures issued from time to time.
2. **Employees and agents** are expected to comply with all relevant legislation, regulations, company rules, the behavioural code and policies & procedures issued from time to time.
3. **Integrity of reporting and recording our financial results** – we properly maintain accurate and complete financial and other business records and communicate full, fair, accurate, timely and understandable financial results and other material information.
4. **Delivering Quality** – We are committed to providing quality products and quality services.
5. **Competing ethically** – We gain competitive advantage through superior performance. We do not engage in unethical or illegal trade practices.
6. **Suppliers** – We aim to contract with suppliers who are committed to good business ethics, values and sound sustainability practices.
7. **Respecting Human Rights** – We respect human rights and require our stakeholders to do the same.
8. **Respecting diversity and fair employment practices** – We are committed to respecting a culturally diverse workforce through practices that provide equal access and fair treatment to all employees on the basis of merit. We do not tolerate harassment or discrimination in the workplace.
9. **Protecting Assets and Information** – We use Lewis’s property, information and opportunities for Lewis’s business purposes and not for unauthorized use. We properly maintain the confidentiality of information and employee data entrusted to us by Lewis or others. We adhere to the Insider Trading confidentiality and process policy which prohibits the use of inside and confidential information for personal gain.
10. **Environment, Health and Safety** – We are committed to safeguarding the health and safety of our employees and conserving the environment.
11. **Sustainability** – We strive for a workplace in which sustainability is a mindset at every level of our operations. We are constantly developing sustainable practices which are not only critical to the future of our company but are also for the benefit of our future generations.
12. **Avoiding conflicts of interests**- We avoid relationships or conduct that might compromise judgment or create actual or apparent conflicts between our personal interests and our loyalty and obligations to Lewis. We do not use our position with Lewis to obtain improper benefits for others and ourselves. We also do not engage in activities or enter into relationships that compete with Lewis.

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13. **Acting with integrity** - We do not offer or accept bribes, kickbacks or inappropriate gifts and/or entertainment. We engage in business practices that are consistent with our ethics and values.
14. **Political contributions** – We do not make contributions on behalf of Lewis to political candidates or parties, even if lawful.
15. **Acknowledgement** – To help ensure compliance with the Code, the company requires that all employees and agents review the Code and acknowledge their adherence in writing on an annual basis.

### Reporting

Any person may openly or anonymously report any ethical concern or potential or actual legal violation, including any accounting, financial, tax or anti-bribery matter, to the Chief Executive Officer. Confidentiality will be maintained to the fullest extent possible while permitting an appropriate investigation.

These reports may be made by postal mail, e-mail or telephone as indicated below:

#### Postal mail

Send mail to:

The Chief Executive Officer, Johan Enslin,  
Lewis Group Limited,  
Universal House,  
53A Victoria Road, Woodstock, 7529, South Africa

#### E-mail

Send e-mail to [ethics@lewisgroup.co.za](mailto:ethics@lewisgroup.co.za)

#### Telephone

Contact the Ethics and Fraud Hotline by dialing **+27 0800 00 5323** The Hot Line is toll free and a representative is available from 08h30 to 17h00, Monday to Friday. A message service is available after hours.

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