



Version 3: 1 September 2017

# **Wilmar Group Policy:**

## **Code of Ethics**

1. It is imperative that the Company maintains the highest standards of ethics in all the businesses that we do.
2. The Code of Ethics prescribes the moral and ethical standard of behaviour that is expected of all Employees. Company's policies, standards and procedures provide more details about how Employees should conduct themselves as members of the Group or Company.
3. The following stated elements of expected ethics cannot be all encompassing. However, we expect our leadership to conduct themselves in the spirit as well as the letter of these codes.
4. Failure to comply with the Group or Company Code of Ethics may result in disciplinary action, which could include termination.
5. Underlying our expectation is the principle of integrity, in all of our behavior and in all our relationships. We must personally and professionally always be seen to be of high integrity.
6. **With respect to our customers, suppliers and other business associates:**
  - We will treat them with respect as they play a vital role in our mission of growing our Group's business.
  - We will, in all business dealings, ensure that we give and receive fair value in the markets in which we serve.
  - We will not falsify any records such that individuals and / or companies may misrepresent to their employers or the authorities with regards to any transactions entered into by any of the Group companies.
  - We will look at each business associate as a potential long-term relationship for our Group and endeavor to earn their loyalty through quality service and experiences.
  - We will award business based upon best business practice i.e. quality and price and without favouritism.
  - We will not solicit gifts from any business associates, be it suppliers or customers under any circumstances.
  - We will endeavour to create long-term "win-win" relationships with quality suppliers that allow us to enjoy excellent quality, price and supplier involvement in continuously improving our products, services and profitability.

- We or any of our immediate family members or relatives, will not own, or have a vested interest in, or be a Director of, any supplier of goods or services to our Group, except by way of shares in a public listed company. Any such relationship that exists or may exist must have the expressed written approval of Chief Executive Officer.

**7. With respect to our Employees:**

- We will respect them as individuals in the belief that all Employees want to do a good job and it is our responsibility as leaders to provide the environment, processes and motivation to enable them to fulfill their potential.
- Honesty and candor will be practised as we counsel our Employees in their performance and job / career expectations.
- We will conduct ourselves as an equal opportunity employer and will not discriminate on the basis of race, religion or sex.

**8. With respect to our Owners (Employers):**

- All decisions must be made in their best long-term interest as investors and providers of employment.
- We will at all times be fair and honest, never taking unwarranted personal advantage of our authority and privileges.
- We will recognize that as long as we are Employees of the Group or Company, we owe our employer our best effort and a fair commitment of time.
- Employees are encouraged to raise concerns about workplace malpractices in a responsible and confidential manner. The Company will treat such disclosures with confidentiality and sensitivity. Employees may inform the following appropriate personnels :
  - CEO or Executive Directors
  - Head of Group Internal Audit
  - Group Head, Human Resources
- We will respect the confidentiality and proprietorship of all information learned as a result of our employment and undertake not to share this information outside our Company during, or after employment with the Group or Company.

- We will manage our companies and our offices in accordance with the policies and procedures as established by the Group or Company and seek approval for any deviation from them.
- In the discharge of his duties, each Employee must abide by the laws of the country in which he operates.
- An Employee shall at all times faithfully and diligently perform such duties and responsibilities as may from time to time be assigned to him by the Group or Company.
- An Employee shall faithfully observe all his Terms and Conditions of Service whether expressed or implied.
- It is the Employee's responsibility to conduct himself at all times in a manner that does not damage or tarnish the good image and reputation of the Group or Company.
- Employees shall keep confidential even after the termination of their employment, all company information that they are privy to in the course of their work.
- An Employee shall inform the Company if a member of the media approaches him and shall not make any statements, whether orally, in writing or in any other form regarding company policies or decisions, nor circulate any such statements.