



# Red Rocket Code of Ethics

## 1. Introduction

Red Rocket Holding and all its subsidiaries (hereafter also "Red Rocket" or the "Company"), has summarised in this code of ethics (hereafter the "Code") its ethical values and the responsibilities of all those bound hereto in their internal and external relations.

This Code has been approved by Red Rocket and is to be implemented by all the subsidiaries of the Red Rocket group of companies.

This Code is to be read in conjunction with the Business Integrity Policy, Whistleblowing Policy and the Anti-Bribery and Anti-Corruption Policy and forms part of the Business Integrity policy framework. The matters addressed specifically in those policies do not bear repeating herein.

## 2. Who does this Code Apply to? (Addressees)

The directors, statutory auditors, employees, consultants, advisors, service providers, contractors, members of staff, auditors, and all those who work, both domestically and in foreign countries, in the name and on behalf or in the interest of Red Rocket and its controlled companies ("Addressees"), and in all instances regardless of whether such persons and entities are contracted to Red Rocket on a temporary, permanent or fixed term basis, are required to comply with the provisions of this Code.

## 3. What Basic Principles Need to be Complied with?

### 3.1. General

3.1.1. The principles and provisions set forth herein exemplify the general duties of diligence, honesty, integrity, and fairness that characterise the performance of the Addressees' duties and the standard of conduct which the Addressees are required to comply with.



3.1.2. Compliance with the requirements of this Code is an integral and essential part of the contractual obligations of the Addressees. Breach by the Addressees may constitute a disciplinary offense and/or a breach of his/her agreement or contract with Red Rocket (punishable in accordance with applicable laws or subject to the remedies in the agreement(s) reached between Red Rocket and the Addressee).

### **3.2. Individuals' Rights, Dignity, and Integrity**

3.2.1. The Company neither tolerates nor encourages any sort of discrimination of any nature whatsoever.

3.2.2. Therefore, the Addressees must acknowledge and respect the personal dignity, privacy, and personality rights of any individual especially when working with colleagues of different nationalities, cultures, religions, ethnicities, genders, and social classes.

3.2.3. In performing their duties, the Addressees shall maintain a conduct inspired by transparency and moral integrity and, in particular, the values of honesty, fairness and good faith.

### **3.3. Professionalism, Responsibilities, and Cooperation**

3.3.1. Each Addressee shall carry out his/her activities with the professionalism required by the nature of the tasks and duties performed, using his/her best endeavours to achieve the assigned objectives and respecting the responsibilities owed by him/her by virtue of his/her duties.

3.3.2. The quality and efficiency of the business organisation and the reputation of the Company are determined to a significant extent by the conduct of each Addressee who is therefore bound to comply herewith to preserve these values.



### **3.4. Traceability**

- 3.4.1. Each Addressee shall maintain adequate documentation of each transaction carried out by them on behalf of Red Rocket in order to allow controls in regard to the motives underlying any choice and the characteristics of the transaction itself.

## **4. Specific Principles and Related Obligations**

### **4.1. General**

- 4.1.1. This Code enumerates the specific ethical principles of Red Rocket and sets out the commitment obligations of the Addressees in respect of such principles.
- 4.1.2. Importantly, it is not possible to foresee each and every ethical obligation or conundrum which may arise. Accordingly, while specific principles are set out below, they should not be considered a closed list and should rather be considered a framework for the Addressees to use as a base to determine the ethos of Red Rocket.

### **4.2. Compliance with Laws**

- 4.2.1. Principle: Red Rocket complies with the applicable laws and regulations in force in all the countries where it operates (which includes compliance by all of its related and affiliated entities).
- 4.2.2. Obligation: Each Addressee must diligently acquire the necessary knowledge of the applicable laws in force from time to time. No conduct contrary to applicable laws will be tolerated, nor can the inadequate or lack of knowledge of the same be justified in any way.



### **4.3. Health and Safety in the Workplace, and Environmental Protection**

#### 4.3.1. Principles:

4.3.1.1. Red Rocket is dedicated to the prevention of accidents and the protection of safety and health of Addressees at work or in the performance of their duties in favour of Red Rocket.

4.3.1.2. The Company endeavours to provide a safe working environment, compliant with applicable laws regarding health and safety. The Company:

4.3.1.2.1. commits to periodically carry out general workplace risk assessments in order to assess the risks to the health and safety of employees, visitors and other third parties and to identify any measures that need to be taken to control those risks;

4.3.1.2.2. provide adequate training and supervision to all Addressees; and

4.3.1.3. provide details of first aid facilities and the names of trained first aiders, which shall be displayed on the notice boards, as well as fire safety instructions.

#### 4.3.2. Obligations:

4.3.2.1. Each Addressee must take care of his/her own health and safety and that of others by inter alia observing applicable health and safety rules and following instructions for the safe use of equipment or any other tools used during the course of the Addressee's services.

4.3.2.2. Any health and safety concern, including but not limited to any equipment or tool fault or damage, must be reported as per the Communications Procedure (IMS-023).

4.3.2.3. All Addressees will familiarise themselves with all training material, facilities and instructions issued by Red Rocket from time to time.

4.3.2.4. All accidents and injuries at work, however minor, must be reported to the responsible supervisor and recorded in terms of the Non-Conformance Procedure (IMS-007).

### **4.4. Environment**

4.4.1. Principle: Red Rocket is dedicated to complying in full with all environmental laws and regulations applicable to it.



4.4.2. **Obligation:** All addressees must comply with the provisions of all environmental laws and are required, in the performance of their services or in the scope of their interaction with Red Rocket, to adopt the necessary measures to prevent the emission or discharge of pollutants, in compliance with applicable laws and in compliance with industry best practices.

#### **4.5. Conflict of Interest**

4.5.1. **Principle:** conflicts of interest should be avoided, reported and managed to ensure that the Addressees act in the best interest of Red Rocket.

4.5.2. **Obligations:**

4.5.2.1. The Addressees, in the performance of their duties, shall avoid any conflict of interest. The following situations, amongst others, are to be considered as a conflict:

4.5.2.1.1. a concealed economic interest in the activities of suppliers, customers and/or competitors;

4.5.2.1.2. exploitation of one's position to pursue interests in conflict with those of the Company;

4.5.2.1.3. use of information acquired during the performance of work activities for the Addressee's own benefit or the benefit of third parties and in any case contrary to the interests of the Company.

4.5.2.2. Any situation that is potentially capable of generating a conflict of interest or otherwise impairing the ability of the Addressee to make decisions in the best interest of the Company, shall be immediately notified by the Addressee to the competent Company's bodies who shall make a determination on how such conflict is to be addressed.

#### **4.6. Protection of Trademarks, Patents, and Intellectual Property**

4.6.1. **Principle:** Red Rocket's intellectual property, including all trademarks and patents are proprietary to it and are material to its business. The intellectual property of Red Rocket must accordingly only be used in an authorised manner and for the benefit of Red Rocket.



4.6.2. Obligations: The following is strictly prohibited:

- 4.6.2.1. Any unauthorised disclosure, distribution, reproduction, use, sale of any intellectual property and/or know-how of the Company for any purpose, for any use and by any means;
- 4.6.2.2. Any conduct intended to alter, counterfeit, use or reproduce the Company's trademarks or patents and designs or projects and/or know-how, domestic or foreign;
- 4.6.2.3. any conduct intended to introduce into the territory of South Africa industrial products with trademarks which have been altered or counterfeited, or other altered or counterfeited distinctive signs;
- 4.6.2.4. the marketing of products with trademarks or patents which are misleading.

**4.7. Human Resources**

4.7.1. Principles:

- 4.7.1.1. Human resources and personnel are key to the success of any business, including the Company .
- 4.7.1.2. All matters relating to employment of staff is to be attended to in accordance with applicable laws (including compliance with any collective agreements which may be applicable).

4.7.2. Obligations:

- 4.7.2.1. Addressees tasked with staff recruitment are to apply a policy of recognition of merit and respect of equal opportunities and avoid favouritism and facilitation of any kind
- 4.7.2.2. Addressees are further required to commit to ensuring that skills, expertise and knowledge of each member of staff can be further expanded in order to ensure the efficient achievement of the Company's business objectives.
- 4.7.2.3. Subject to compliance with law, the determination of remuneration (monetary and other benefits), at any level, must follow an assessment of the qualification, specific skills, experience acquired, proved merit and achievement of assigned goals.



4.7.2.4. The proposal of increases in remuneration, other benefits, or career advancement, with the only objective being to receive in return activities inconsistent with and in violation of applicable laws, is prohibited under this Code.

#### **4.8. Outside Interests**

4.8.1. Principle: Red Rocket does not restrict outside activities, provide that the conduct of Addressees is not detrimental to Red Rocket's business interests.

4.8.2. Obligations: Addressees who are staff of Red Rocket are only permitted to engage in work activities outside of the course and scope of their employment or other contractual relationship with Red Rocket if such activities are not detrimental to Red Rocket's business and are carried out in accordance with applicable laws.

#### **4.9. Alcohol and Drugs**

4.9.1. Principle: inappropriate and unauthorised use of drugs and alcohol is prohibited.

4.9.2. Obligation:

4.9.2.1. Use of drugs at the workplace is prohibited.

4.9.2.2. Save in the following exceptions, the use of alcohol at the workplace is prohibited:

4.9.2.2.1. Company function;

4.9.2.2.2. Outside of working hours;

4.9.2.2.3. Where expressly authorised by a member of the C-Suite.

#### **4.10. Use of Company Assets and Documents**

4.10.1. Principle: Red Rocket values all of the assets which it owns to operate its business and use thereof must at all times be proper, in the furtherance of Red Rocket's business and subject to written instructions and manuals.



#### 4.10.2. Obligation:

- 4.10.2.1. All of the assets of the Company are to be used only for official operational purposes, and in accordance with applicable laws.
- 4.10.2.2. Company assets may not be used for personal purposes and for purposes contrary to mandatory provisions of law, to public order and/or to morality, including committing or causing the commission of offences or racial intolerance, the incitement to violence and the violation of human rights.
- 4.10.2.3. No Addressee is permitted to make any recording or audio-visual, electronic, hardcopy, or photographic reproduction of business documents, except in cases where such activities fall within the normal performance of the duties assigned to him/her, or in case they are required and authorised.
- 4.10.2.4. In particular in regard to the IT equipment of the Company, it is expressly prohibited to engage in any conduct which may damage, alter, impair or destroy in any way the computer or telecommunication systems, computer programs and stored data of the Company. Each Addressee is personally liable for any failure to comply with the Data Protection and IT Policy (ITM-006) and, in particular, is responsible for maintaining the security of the above business assets, avoiding any fraudulent or improper use of the same as well as the disclosure, even to colleagues, of their user id and password.
- 4.10.2.5. The use of the property must be exclusively functional to the performance of business activities or for the purposes authorised by the heads of the departments concerned. It is expressly forbidden to use the Company's IT resources for consultation, access and, in general, for any activity which relates to sites containing all kinds of pornography.

#### **4.11. Confidential Information and Privacy**

- 4.11.1. Principle: Compliance with privacy policies and internal procedures on confidential information is a fundamental and necessary rule to be respected. All information shared with the





Addressees in the course of their relationship with Red Rocket are the exclusive property of the Company.

#### 4.11.2. Obligations:

- 4.11.2.1. Each Addressee shall safeguard the confidentiality of the information and data acquired in the exercise of their duties.
- 4.11.2.2. It is absolutely forbidden to use confidential information for purposes other than those for which it was disclosed, except if such use has been expressly authorised, which shall in any case be in strict compliance with the legislation on information disclosure in force and internal Company's rules.
- 4.11.2.3. The protection of information and data contained or stored in computer systems is ensured by the adoption of appropriate security measures and policies, including the Data Protection and IT Policy (ITM-006), which the Addressees shall always respect and comply with.
- 4.11.2.4. The data and information collected may be processed by automated tools for the time period strictly necessary to achieve the purposes for which they were collected.
- 4.11.2.5. It is rigorously forbidden to unlawfully use or to enable unauthorised access to confidential information or data.

#### **4.12. Competition**

4.12.1. Principle: the Addressees shall not engage in anti-competitive behavior.

4.12.2. Obligations: the following behaviour is strictly prohibited:

- 4.12.2.1. any concerted or tacit action purported to or having the effect of preventing, restricting or distorting competition in a market, in particular where such practice, or failure to act may:
  - (i) restrict access to the market or free exercise of competition by other companies;
  - (ii) prevent price fixing by market forces by artificially favoring the increase or decrease in prices;
  - (iii) limit or control production, market opportunities, investments or technical progress, or
  - (iv) allocate markets or sources of supply.



- 4.12.2.2. any abuse of a dominant position within a domestic market or in a substantial part of it.
- 4.12.2.3. any price offer or predatory pricing purported to or having the effect of eliminating a market or preventing a company or one of its products from accessing a market.

#### **4.13. Communications**

##### 4.13.1. Principles:

- 4.13.1.1. Information disclosed to third parties must be accurate, clear, and transparent.
- 4.13.1.2. Red Rocket ensures the transparency of the choices made in the performance of its activities. The flow of information must be managed in accordance with criteria of correctness, accuracy, and timeliness.
- 4.13.1.3. Red Rocket is committed to fulfil its legal obligations, including those in relation to communications to the relevant authorities, with particular reference to any supervisory authority, and to cooperate with such authorities in the performance of their duties in accordance with applicable laws in force.

##### 4.13.2. Obligations:

- 4.13.2.1. Public communication and disclosures, including to the media, are the exclusive responsibility of the Company's officers or representatives specifically delegated for such purpose.
- 4.13.2.2. Addressees are expressly forbidden to provide or to undertake to reveal information to representatives or members of the media without the authorisation of the competent Company's officer or representative.
- 4.13.2.3. The Addressees shall not offer payments, gifts or other donations aimed at influencing the professional activity of the media and must refrain from circulating false or misleading information, which are likely to deceive the public.
- 4.13.2.4. The Addressees assigned to provide to third parties news regarding the objectives, activities, business results of the Company, by participating in public events, conferences,



congresses, seminars or writing articles, essays and publications in general, are required to obtain the authorisation from the Company's top management as to the drafted texts and reports and the communication methods, agreeing and verifying in advance the contents with the competent Company's officer.

- 4.13.2.5. It is therefore expressly forbidden to disclose confidential information relating to projects, negotiations, initiatives, agreements, commitments, especially if upcoming and uncertain, relating to the Company, which are not in the public domain.
- 4.13.2.6. Any information reports, both internal and external (to suppliers, customers, institutional parties) must be scrupulously prepared in accordance with such principles.

#### **4.14. Accounting Data**

##### 4.14.1. Principles:

- 4.14.1.1. Red Rocket requires compliance with all applicable regulations and, in particular, with rules and provisions relating to the preparation of financial statements and any type of mandatory administrative and accounting documents.
- 4.14.1.2. Accounting is based on generally accepted accounting principles and systematically detects the transactions resulting from the management of the Company.

##### 4.14.2. Obligations:

- 4.14.2.1. Accounting records are to be maintained in accordance with the principles of transparency, truthfulness, completeness, clarity, precision, accuracy, and compliance with applicable laws in force.
- 4.14.2.2. Adequate documentation must be kept in support and as proof of each transaction, so as to allow a simple accounting record in regard to the traceability in time of the transaction and the identification of any related responsibility.
- 4.14.2.3. Adequate supporting documentation must be kept for each accounting entry that reflects a corporate transaction.



- 4.14.2.4. Such documentation must be sufficient for a third party to identify the purpose of the transaction. The supporting documentation must be readily available and stored according to appropriate standards, allowing easy access and consultation by internal and external supervisory bodies, and must be preserved for 6 years from the end of the financial year in which the transaction took place, or longer if: (i) the transaction takes place over more than one of the Company's accounting periods; (ii) the Company has bought something that it expects to retain for more than 6 years, such as equipment or machinery; (iii) the Company Tax Return has been sent late; (iv) The relevant tax authority has started a compliance check into the Company Tax Return.
- 4.14.2.5. Addressees are required to comply with proper and timely accounting recording of all management activities and to ensure that management transactions are represented correctly and in a timely manner, so that the administrative and accounting system can achieve their purposes.
- 4.14.2.6. Addressees are required to promptly report the existence of errors or omissions in accounting recording and any conduct which does not comply with the provisions of this paragraph.

#### **4.15. Relations with Supervisory Bodies**

- 4.15.1.1. Principle: Red Rocket bases its relationships with supervisory bodies on the principles of diligence, professionalism, transparency, collaboration, receptiveness, and full respect of their institutional role, timely and promptly executing their requests and any required formalities.
- 4.15.1.2. Obligation: Addressees shall ensure that all data and documents shall be made available in a timely manner and in a language that is clear, objective and exhaustive in order to provide accurate, complete, correct and truthful information, in any case avoiding and reporting in the most suitable form and manner situations of conflict of interest.



#### **4.16. Money Laundering**

4.16.1.1. Principle: Red Rocket performs its business activities in strict compliance with applicable anti-money laundering laws and regulations issued by the competent authorities, and it undertakes to refuse to engage in suspicious transactions that do not respect the principles of fairness and transparency.

4.16.2. Obligations: Addressees are required:

4.16.2.1. to verify in advance all information available on business counterparts, suppliers, employees, and consultants with regard to their respectability and legitimacy of their business before entering into any business or contractual relationship; and

4.16.2.2. to avoid any involvement in transactions potentially capable to facilitate money laundering from illegal or criminal activities, acting in strict compliance with anti-money laundering legislation and regulations and internal control procedures.

### **5. Rules for the Circulation and Implementation of the Code**

5.1. The Code is widely circulated internally and is available to any party which deals with Red Rocket and who does or may fall within the definition of an Addressee.

5.2. The Code is brought to the attention of all Addressees in an accessible place, in the most appropriate manner. It can also be requested to the competent Company's bodies.

### **6. Disciplinary Measures for Violations of the Code**

#### **6.1. Compliance**

6.1.1. Compliance with the rules contained in this Code shall be considered an essential part of the contractual obligations of the Addressees and of those who become recipients of this Code, with reference to the existing contract in force.



## **6.2. Penalties**


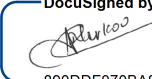
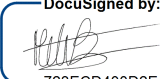
- 6.2.1. The Company, through the bodies and officers expressly appointed for such purposes, shall impose, with consistency, fairness, and uniformity, penalties proportionate to the violation of the Code and in accordance with applicable legal and regulatory provisions.
- 6.2.2. Any breach by the Addressees shall be notified promptly and in writing to the competent Company's bodies by anyone who becomes aware of the same. These offences shall be punished by the competent bodies in accordance to the Company's internal rules and as expressly provided for in the relevant terms of the agreement or contract with the Addressee, in any case applying adequate penalties, which may include the termination of the agreement or contract, without prejudice to the right to compensation for damages.

## **6.3. Disclosures and Whistle Blowing**

- 6.3.1. Subject to compliance with any measures provided by laws or collective agreements in force and subject to the requirements of the law, competent Company's bodies are authorised to receive requests for information, complaints or reports of potential or actual violations of this Code. Any request for clarification, complaint or inquiry will be kept strictly confidential in accordance with applicable laws.
- 6.3.2. It is the obligation of each Addressee of this Code to report, without delay, any behaviour inconsistent with the principles of the Code performed by any Addressee.
- 6.3.3. The Company will ensure the confidentiality of the identity of the informant and will protect the informant from retaliation, unlawful influence, hardship, and discriminations of any kind in the workplace, as a consequence of reporting a violation of the Code.
- 6.3.4. We encourage Addressees to freely report suspected as well as potential acts and conducts in violation of corporate procedures as well as actual occurrence(s) of illegal, unethical, or inappropriate events, behaviours, or practices. Addressees are referred to the Whistleblowing Policy (LEG-002) for detail on the reporting, investigation and escalation process, as well as the protections afforded to whistleblowers that make disclosures in good faith.



## 7. Revision and Approval History

Rev	Date	Updated by	Summary of changes	Reviewed by	Approved by
0	2021/01/14	K. De Wet	First Issue	K. De Wet	M. Brambilla
1	2025/01/13	N. Walker-Woodard	Comprehensive overhaul, and brand refresh.	Z. Khadaroo  Signed by: E19085863ABB499... and A. Kureeman-Nurkoo  DocuSigned by: 890DDF070BA84C3... Red Rocket Holding Board Secretary	M. Brambilla  DocuSigned by: 723ECD400D2E4BF... Authorised Representative