



GROUP CONFLICTS OF INTEREST POLICY

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APPROVAL AND OWNERSHIP

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REVISION HISTORY

Version	Revision Date	Description	Next review Date
V1.4	Sep 2017	Annual review conducted by policy owner but no updates arising. Report and minute at Group R&S Committee.	Sep 2018
V 2.0	Sep 2018	Amendments arising from detailed review of policies by Norton Rose Fulbright London. Adjustments to align with the new Alternative Business Interests policy	Sep 2019
V3.0	Sep 2021	Merge the Alternative Business Interests Policy with the Conflicts of Interest Policy	Feb 2022
V4.0	Feb 2022	Periodic review in terms of the board matrix to ensure it remains relevant and correct.	Feb 2024
V4.1	Sep 2022	Updated to include annual attestation of compliance with the policy in line with the KPMG audit findings.	Sep 2024

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DEFINITIONS AND ABBREVIATIONS

Table 1: Definitions

Terminology	Description
Associate	<p>There are three aspects in the definition of associate, and ALL of these apply.</p> <p>An associate means a person, other than a close family member (as defined below):</p> <p style="padding-left: 20px;">with whom an employee has a personal relationship</p> <p>AND</p> <p style="padding-left: 20px;">who has the ability to exercise influence over the employee through that relationship</p> <p>AND</p> <p style="padding-left: 20px;">who has the ability to use that influence to gain an unfair advantage or other benefit in relation to any business dealings with Barloworld, whether or not such influence is intended to be illegal, unethical, fraudulent or damaging to Barloworld.</p> <p>Examples may include a person with whom an employee is acquainted in the community; a friend or friend of the employee's family; a colleague with common business or professional interests; or an extended family member beyond the second degree.</p>
Barloworld	<p>Barloworld means Barloworld Limited and its subsidiaries, divisions, and business units in all countries in which it does business, or any individual subsidiary in its own capacity.</p> <p>It does not include joint ventures, other than those where Barloworld exercises management control, nor does it include investments where Barloworld owns less than 50%.</p>
Close family member	<p>A close family member means a family member, either in the immediate family of an Employee (first degree of relationship) or in the second degree of relationship.</p> <p>First degree relationships include:</p> <ul style="list-style-type: none"> • spouse, partner (living together in relationship similar to marriage), or • natural, adoptive or step: • children; • parents; or • siblings. <p>Second degree relationships include:</p> <ul style="list-style-type: none"> • mother-in-law or father-in-law; • brother -in law or sister-in-law; • aunt or uncle; or • niece or nephew.
Conflict of interest	<p>A conflict of interest arises when an employee places or is in a position to place Barloworld at a disadvantage by using the relationship of</p>

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	<p>employment to favour their own personal interests or the interests of a close family member or an associate, rather than executing their duties objectively and in the best interests of Barloworld.</p> <p>A conflict of interest arises when an employee takes advantage of or uses the relationship of employment in Barloworld by using Barloworld assets, time, resources, or information to pursue their own personal interests or the interests of a close family member or an associate or has the opportunity to do so.</p> <p>A conflict may be actual, potential, or perceived. Each represents a risk to Barloworld and/or to the employee, including but not limited to, breach of a law, financial loss, reputational damage, or fraud.</p>
Employee(s)	<p>All Barloworld employees working at all levels and grades (whether permanent, fixed-term or temporary), including executive directors, senior managers, officers, trainees, seconded staff, home based staff, casual staff, agency staff, volunteers and interns who have a contract of employment with Barloworld, whether the contract is for full-time or part-time employment or a fixed period contract.</p>
Friend	<p>Employees are encouraged to be cautious when determining whether someone is a “friend”. Relationships and friendships may develop over time, and a person may become a “friend”. Friendships may also be difficult to define, particularly where the point is that a relationship evolves from 2 persons being acquaintances to “friends”.</p> <p>Employees should be mindful of this and the perceptions that may develop based on their engagements with persons who are external to Barloworld. Whilst ultimately the assessment will be based on the ability of the person to exercise influence over the employee, the following scenarios are indicative of situations where a person will likely be a “friend”:</p> <ul style="list-style-type: none"> • A person who is “house friends” with an employee – in other words, who socializes with the employee at their home and/or extends similar invitations to host the employee at their home. • A person who invites the employee to personal gatherings or events such as birthdays, weddings, religious and/or traditional ceremonies. <p>A person who otherwise socializes with an employee outside of the workplace or formal business settings in a manner that is not incidental based on gatherings of groups of persons and entails one-on-one social engagements.</p>
Professional Network	<p>It is common cause that Employees will network / associate with other Employees in a working environment, as colleagues (who may also become friends), and / or with other professionals as part of a common working environment / professional fraternity / academic network.</p> <p>However, to the extent that an Employee finds themselves in a decision-making process regarding a member of their current / previous professional network, it would be prudent and in the interests of transparency to declare this professional network to other decision-makers, in order for the impact of any actual, potential or perceived conflicts of interests to be assessed prior to decision-making.</p>

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Table 2: Abbreviations

Abbreviation	Description
Divisional CEO	Chief Executive Officer of a particular Division
Group CEO	Group Chief Executive Officer
Group FD	Group Finance Director

1 Preamble and Policy Summary

Barloworld is committed to conducting business in a manner that does not give rise to conflicts of interests between the personal interests of an employee and the interests of Barloworld. Where conflicts of interests do arise, Barloworld has processes in place to mitigate the risk that a decision will be made based on impaired judgment and to ensure that there are appropriate checks and balances in place.

2 Purpose and Objective

When the personal interest of an employee impairs his or her ability to make objective, unbiased business decisions on behalf of Barloworld, the employee has a conflict of interest. An employee may face a conflict of interests when his or her professional duties as an employee of Barloworld and their personal interests diverge. Conflicts of interests may take many different forms including, but not limited to, financial interests in the business of a supplier or customer, spending Barloworld work time, resources, assets for personal gain, recruiting a close family member or associate, and/or engaging in employment outside Barloworld. This is not an exclusive list of all the situations that may give rise to a conflict. The purpose of this policy is to unpack this further and help employees better understand what constitutes a conflict of interest and what steps they must take if they face an actual or perceived conflict of interests.

3 Scope

This policy applies to all employees of Barloworld as defined below. Certain aspects of this policy only apply to certain employees of Barloworld. For example, the declaration and approvals process for grade 15 and above employees are different from all other employees.

It should be noted that whilst this policy applies to all executive directors of Barloworld and provides for specific rules and processes, this policy does not replace or over-ride the legal duties and obligations of such directors that arise by virtue of holding the office of a director. For example, executive directors of Barloworld companies in South Africa are subject to fiduciary duties and are expected to comply with these legal duties and obligations over and above complying with this policy.

4 Roles and Responsibilities

Executive management has the responsibility to ensure compliance with this policy and the discretion to define the processes, procedures, and other mechanisms by which the policy is implemented.

5 Policy Statement

5.1 Expectations of Employees

5.1.1. All employees of Barloworld are expected to:

- a) Maintain the highest possible standards of integrity in all business relationships, both inside and outside of Barloworld.
- b) Reject any business practice which might reasonably be deemed improper.
- c) Never use their authority or position for personal gain
- d) Respect the assets and resources of Barloworld (including required working hours) and ensure that these are not misused / abused for personal gain and / or unjust enrichment.
- e) At all times, act with impartiality, independence, and integrity.
- f) Consult with the relevant advisors / specialists if in doubt as to whether a disclosure is required or not.
- g) Avoid being, or giving the appearance of being, in a position that may give rise to a conflict of interest.

5.1.2. All employees of Barloworld are expected to sign an annual attestation per Annexure A: (i) acknowledging that they have read and understand the contents of this Policy; and (ii) providing an undertaking to comply with the contents of this Policy.

5.2 Restrictions

5.2.1. Employees of Barloworld may not make any decisions or engage in any transaction on behalf of Barloworld if they are conflicted unless the conflict has been declared and they have been given express permission to proceed by an appropriately authorized person or body on the basis set out in this policy and the division specific processes that supplement this policy.

5.2.2. It is not possible to list all the situations that may give rise to a conflict of interests, nor is it possible to expressly list all the scenarios that are prohibited based on the above restriction from engaging in any unauthorized decision-making or transaction where there is a conflict. Be that as it may, the following non-exhaustive list of specific restrictions applies to all employees (unless an employee is given express permission to proceed by an appropriately authorized person or body):

- a) Employees may not participate in processes or decision-making involving candidates or employees who are close family members, friends, associates, other employees with whom they have a romantic relationship. Examples of such situations include but not limited to:
 - i. Recruitment, interviewing, appointment decisions. Whilst employees may refer such candidates when recruitment opportunities arise, they should be careful to avoid participating in the processes or decision-making in any way. This includes avoiding forming part of any interview panel.
 - ii. Being in a direct reporting line, or working in the same department / function or from the same office / site / operations
 - iii. Salary increases and/or bonus
 - iv. Decisions regarding the potential promotion or demotion of the employee
 - v. Disciplinary hearings and investigations

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- vi. Approvals in line with internal control activities and segregation of duties
 - vii. Disclosure and sharing of confidential information
 - viii. Any other decisions that could negatively impact objectivity and employee's ability to act in the best interests of Barloworld.
- b) Where an employee has a direct or indirect (via close family members, friends, former colleagues, professional network, or associates) financial or personal interest in a counterparty to a transaction with Barloworld, the employee must not participate in and/or influence any decision relating to the transaction or try to influence any decision makers. For example, if employee's wife or employee's friend is a shareholder, director, or employee of a potential supplier of Barloworld, the employee should not participate in any process in terms of which the supplier is selected and/or allocated work. The same would apply if the employee is/was in a romantic relationship with the person that owns or runs the business concerned.
- c) An employee may not engage in outside work (as part of formal employment or as a non-executive director, consultant, or contractor) unless they have been given permission to do so based on the processes detailed in this policy, and provided there is no risk to interests of Barloworld and only in relation to the organizations:
- i. which are not competitors or potential competitors of Barloworld;
 - ii. which are not in a commercial relationship with Barloworld;
 - iii. where such service or holding of an office does not compromise any justified business interests of Barloworld;
 - iv. which do not receive contributions from Barloworld through donations, sponsorships, or charitable giving.
- d) At any given time, an employee may only hold one directorship of a stock exchange listed company or unlisted company, and one directorship of a non-profit organization, professional body, or industry association.

5.3 Declaration Requirements

- 5.3.1. When an employee faces a situation that may give rise to a conflict of interests, the employee is required to disclose the circumstances in the prescribed disclosure template and/or on the relevant system used by the relevant Barloworld division that they work in. Making informal or verbal disclosures to any functionary, including the employee's line manager, will not be sufficient and a failure to make a written disclosure in the prescribed format will constitute a breach of this policy.
- 5.3.2. Disclosing a conflict does not absolve an employee of the responsibility to avoid making any decision and/or engaging in a transaction or following any other agreed conflict resolution conditions. For the avoidance of any doubt, an employee may not proceed unless they have received express permission to do so as set out in this policy and the division specific processes that supplement this policy. Similarly, employees should not take it upon themselves to attempt to take any actions on a conflict of interests at their own discretion if they already form part of the process in respect of which the conflict arises. Employees must

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immediately declare the conflict because a failure to do so will itself constitute a breach of this policy.

- 5.3.3. Disclosures must be made timeously when the actual, potential, or perceived conflict of interests arises. Employees should not proceed with a decision or transaction if they know that a conflict has arisen. Proceeding when conflicted, will expose the employee to the potential consequences of policy violation detailed below and retrospectively declaring a conflict will not absolve the employee of their responsibility to avoid acting when conflicted.
- 5.3.4. Each conflict that an employee faces must be dealt with and declared separately. Declaring a conflict in a particular situation does not absolve an employee of their responsibility to declare future conflicts (even if the future conflicts involve the same counterparties and/or people disclosed in an earlier conflict).
- 5.3.5. The circumstances of a conflict may change over time. Where an employee has been given a particular permission in respect of a conflict (for example, permission to engage in outside work), the employee is required to inform the person or forum that gave the permission of any material change of circumstances. The measure that will be applied is whether the employee ought reasonably to have disclosed the change in the circumstances. The test will be objective and a failure to disclose material changes will constitute a breach of this policy.
- 5.3.6. Barloworld divisions may have separate periodic disclosure requirements (including annual declaration processes), but the disclosure cannot be less frequent than once in two years. All employees are required to abide by such requirements and make (and update) their disclosures based on such requirements.

5.4 Managing Conflicts of interest

- 5.4.1. Nothing in this section should be interpreted as absolving any employee of their obligation to avoid conflicts. Employees remain responsible for avoiding conflicts, declaring conflicts, and refraining from participating in a decision-making or transaction where they are conflicted unless they have been given permission to do so.
- 5.4.2. Each division of Barloworld shall implement an appropriate process to assess conflicts that are declared by employees and determine:
 - a) whether the employee concerned may participate in the process or transaction further, and if so, under what conditions;
 - b) whether Barloworld may continue to transact with an impacted counterparty, and if so, under what conditions; and
 - c) whether any further controls need to be implemented in the circumstances to manage the conflict.
- 5.4.3. Whilst each division will determine its own processes, the following minimum requirements shall be implemented by each division:
 - a) Each division shall have a declarations template and/or appropriate system to be used by employees who make disclosures, and each division shall clearly communicate the required declaration process to its employees.

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- b) The division must determine whether annual or other periodic declarations must be made (regardless of whether any conflict arises) but the disclosure cannot be less frequent than once in two years.
- c) The template and/or system should clearly stipulate what information the employee is required to provide as part of the declaration. Whilst the division shall determine what specific information is required, as a minimum it should include:
 - i. A description / explanation of how the conflict has arisen;
 - ii. The full particulars of the third party concerned, including the full name of any natural person involved and the full name and registration number of any company or other juristic entity concerned;
 - iii. The nature of the relationship between the employee and the third party (where applicable);
 - iv. The resolution conditions to be followed by the employee to make sure Barloworld interests are not impaired, including additional controls; and
 - v. If the employee seeks to take-up outside work, the nature of the outside work, whether the employee will be employed by another company or paid as a contractor or consultant, the estimated hours per week that the commitment will entail and the estimated remuneration that the employee will receive.
- d) Each division shall establish a process for considering conflicts of interests and making the determinations in 6.4.2 above.
- e) Records must be kept of the processes involved in respect of each and every conflict declared and where required, the employee that has made a declaration must be informed of the outcome.

5.4.4. Barloworld realizes that the above forward-looking declaration process will not always be practicable in all circumstances, particularly where a conflict arises suddenly and unexpectedly. For example, an employee may find her or himself in a meeting where they realize that they are part of a forum that is required to make a decision in respect of which they are (or may be) conflicted. In such circumstances, the employee is expected to flag the conflict to the other persons present and recuse her or himself from the meeting. The employee is further expected to complete a declaration post the meeting to ensure that there is a track-record recording what transpired.

5.4.5. Whilst engaging in outside work is a specific type of conflict of interest that may arise, the processes for dealing with such conflicts shall be principally the same as for other conflicts. In this regard, employees who wish to engage in outside work must declare the potential conflict and seek permission to proceed. The processes implemented by each division should cater for this and the manner in which such requests are considered and approved or denied should be clearly established.

5.4.6. The person or forum of each division that is responsible for considering conflicts is responsible for ensuring that conflicts are appropriately managed through tailored measures that are appropriate in the circumstances. There is no one standard resolution to all conflicts and the person or forum must exercise an appropriate level of discretion in the circumstances.

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However, the following non-exhaustive list of guiding circumstances and controls can be taken into account by the decision-maker:

- a) When a conflict pertains to the recruitment of a potential candidate, it will typically be appropriate to remove the conflicted employee from the process entirely. This would include, but not be limited to, avoiding participating in any short-listing of candidates, not participating in interviews, and not formally or informally providing any input into the selection of the successful candidate for a position or any attempts to influence selection decision makers.
- b) In the event that a conflict arises based on a romantic relationship between employees, it will typically be appropriate to remove the conflicted employee from any processes that impact the employee that they are in a relationship with and ensure that there are no direct reporting relationships between these employees. Where removal is not practicable, appropriate checks and balances should be put in place such as bringing other persons into the decision-making that impacts the person that the conflicted employee is in a relationship with. Such persons cannot be subordinates of any of the conflicted employees, should be informed of the conflict and required to objectively make any decisions on behalf of the conflicted employees. Employees in romantic relationships should ensure that their workplace relationship is disclosed to the company using the same disclosure system / template required for all other disclosures, and that these employees should not work in a manner where they are in close proximity to each other (such as being in the same department, function, reporting line, or operating from the same offices / site).
- c) An employee should not participate in any decision to appoint or allocate work to a counterparty that they have a direct or indirect interest in. As such, if the conflict relates to such circumstances, the employee should typically be removed from all decision-making involving the counterparty. The counterparty may not be disqualified from further processes provided that decision makers are made aware of the conflict of interest and objective, transparent and competitive procurement processes are followed to assess counterparties and appoint the optimal counterparty. Decision makers in this process cannot be subordinates or be themselves in a conflict of interest with the conflicted employee in question (e.g., family members, friends, being in a romantic relationship etc.).
- d) When an employee requests permission to engage in outside work, input should be obtained from the line manager of the employee and other forum or employees in charge of approval of conflicts of interest in accordance with the division's procedures. A key consideration will be whether the employee can properly and objectively perform his or her duties on behalf of Barloworld if they engage in the outside work. If the employee is given permission to proceed, conditions would typically be imposed such as:
 - i. Refraining from engaging in the outside work during ordinary working hours;
 - ii. Seeking a renewal of the permission at reasonable intervals (not exceeding annually);
 - iii. Clear performance requirements in terms of which the permission will be withdrawn if the performance of the employee drops;

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- iv. Refraining from using Barloworld equipment, resources, or information for the outside work; and
- v. Immediately informing their line manager if the company or business that they are engaged by as part of the outside work comes into competition with Barloworld or is required to commercially transact with Barloworld.

Note: When an employee is removed from directly participating in a process, it is important to avoid making a subordinate of the employee responsible for the decision-making. The reason for this is that the subordinate may not be “independent” of their superior and may be inappropriately influenced in the decision-making. As such, when an employee is removed, the decision-making should be assigned to someone that does not report to that employee (wherever possible).

The circumstances that arise may be complex and nuanced and the person or forum may require expert opinion or input. If the person or forum requires support, the Group Executive: Ethics and Compliance should be engaged.

5.4.7. Employees who are in senior leadership positions (global grade 15 and above) are required to obtain an additional level of approval for any category of disclosure of conflicts of interest, in addition to the divisional approval processes. In this regard, these employees shall be subject to the following:

- a) Required to log their disclosures on the same template or system as all other employees in the relevant division,
- b) If the employee seeks permission to proceed with any category of disclosure of conflicts of interest, the declaration should in the first instance be directed in writing to the line manager, who will make a recommendation to the Divisional CEO. The Divisional CEO would then review such declaration and indicate whether in support of the line manager’s approval, before submitting it to the Barloworld Group CEO. The Barloworld Group CEO will then consider the request and determine whether to approve or deny the request. The Executive: Compliance and Ethics shall provide support to the Barloworld Group CEO in order to document and communicate the decision made.
- c) Where the employee with the conflict is the Barloworld Group CEO him or herself, they must disclose the conflict to the Chairperson of the Board. The Chairperson shall engage with the Board and together with the Board determine how to deal with the disclosure.

6 Communication

This policy must be communicated to all employees along with the division specific requirements contemplated in this policy. Each division is responsible to determine the format of the training and nature of records kept albeit that the division must ensure that employees are aware of this policy and the division specific requirements for declaring and managing conflicts.

7 Related Policies & Other Documents

The following policies are related and should be read in conjunction with this Policy:

Document Name
The Barloworld Worldwide Code of Conduct
The Barloworld Anti-Bribery and Corruption policy
The Barloworld Gifts and Hospitality policy
The Barloworld Group Social Media policy
The Barloworld Group Acceptable Use policy
The Barloworld Fraud Risk Management Policy and Framework
The Global Whistleblowing Policy

8 Raising Concerns and Seeking Guidance

If any person becomes aware of a circumstance or action that violates or appears to violate this policy on bribery and corruption, they are encouraged to contact their manager, the Group General Counsel, the Group Compliance Manager, or alternatively the Barloworld Ethics Line at www.tip-offs.com.

The Barloworld Ethics Line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions, or actions that violate the Barloworld Worldwide Code of Conduct.

The Barloworld Global Whistleblowing Policy applies to the use of the Barloworld Ethics Line, and it contains the contact details pertaining to each company, division, or business unit.

Barloworld is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

9 Breach of Policy

Failure to comply with this Policy could amount to gross misconduct and/or a material breach of the contract of employment, and this may result in disciplinary action in line with the applicable Barloworld disciplinary codes and/or fines or penalties in terms of applicable laws. Barloworld may also take legal action against third parties based on the facts that give rise to the conflict of interests.

10 Deviations from Policy

It is the responsibility of divisional executive management to ensure that this policy is adopted and approved by an appropriate divisional executive body and minimum requirements set out in this policy are implemented.

Any deviations from this policy that reduce the minimum standard of this Barloworld policy requirements are prohibited.

Any deviations from this policy that amend the meaning or raise the minimum standard of these Barloworld policy requirements must be pre-approved, in writing by the Barloworld Executive:

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Compliance and Ethics. Once approved, such deviations must be tabled, approved, and recorded at an appropriate divisional executive meeting.

For provisions of Paragraph 5.4.7, no deviations may be made to this Barloworld policy without prior approval, in writing by the Barloworld Group CEO. This requirement applies for any deviation, whether or not it amends the meaning or raises the minimum standard of the Policy. If approved by the Barloworld Group CEO, such deviations must be tabled, approved, and recorded at a Group Human Capital executive meeting and an appropriate divisional executive meeting.

Language translations of Barloworld policies must be conducted or checked by a professional language translator to avoid translation errors that may change the meaning of the policy requirements.

Annexure A

EMPLOYEE ATTESTATION

I, the undersigned, _____,

- ✓ Have carefully read the Policy(-ies) and undertake to comply
- ✓ Know the contact person in case of any questions on this or other E&C Policies
- ✓ Undertake to comply with all of the requirements of the Policy(-ies)
- ✓ Am not aware of any ongoing breaches of the Policy(-ies) and undertake to report any breaches that I become aware of through the appropriate channels
- ✓ Understand Barloworld commitment to zero tolerance to bribery, corruption, violations of the Code of Conduct and will act accordingly, even if some situations are not specifically mentioned in the Barloworld policies.

Signature: _____

Name: _____

Date: _____

Place: _____