

	<b>POLICY CODE OF CONDUCT</b>	Doc No: <b>POL-001</b>
		Revised By / On: COO & CFO
		Revision Number: 2 / October 2025
		Effective Since: March 2017
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**a. Purpose**  
This Policy explains the code of ethics for Biddulphs International

**b. Scope**  
This policy applies to all our employees

**c. References**  
**POL-007** Affirmative Action and Anti-Discrimination Policy  
**POL-012** Biddulphs Conflict of Interest Policy  
**POL-013** Gifts Policy  
**POL-017-018** Promotion Of Access to Information Act (PAIA) & POPI Policy  
**POL-025** Treating Customers Fairly  
**HRP-002-007** Disciplinary Code and Procedure

**d. Definitions and Abbreviations**  
See **IO-GUIDE-01** Abbreviations and Definitions

**e. Responsibilities and Authorities**  
Biddulphs is committed to doing business in the best possible way.

**1. POLICY**  
**Code of Conduct:** Its relationships with customers, employees and suppliers must always be conducted within the following principles:

**1.1 Ethics**  
At all times management and staff must do what is ethically right and correct. Biddulphs maintains a zero-tolerance attitude towards theft, corruption, extortion, anti-competitive practices and other business malpractices.

**1.2 Conflict of Interest**  
Employees may not have an interest or activity which constitutes a conflict of interest with Biddulphs and its business. This is covered more fully in the **POL-012** Biddulphs Conflict of Interest Policy.

**1.3 Bribes / Gifts**  
Employees may not receive or give bribes or receive or give inappropriate gifts. This is covered more in **POL-013** Gifts Policy.

**1.4 Treating Customers Fairly (TCF)**  
All staff must adhere to the principles set out in **POL-025** TCF Policy.

**1.5 Compliance with the Law**  
Management and employees must always ensure that the company complies with all relevant laws, rules and legislation.

**1.6 OTHER POLICIES**  
Biddulphs has a number of other policies which govern the manner in which its business is operated and these are available on request.

**2. CHANGE / REVISION HISTORY**

Rev No	Changes	Pages	Effective date
0	Complete revision of QMS documentation and alignment with ISO 9001:2015	All	Mar 2017
1	Revised	All	2019.01.01
2	TCF	All	2021.09.01

**3. APPROVAL**

Designation	Name	Signature
Managing Director	O Farmerey	