



# CODE OF ETHICS

The OMA Code of Ethics fits with the Group's operating values and the OMA Group Ethos.

The main elements of the OMA Ethos are:

1. Two-way loyalty of staff to management and management to staff.
2. Commitment to quality service - going the extra mile.
3. Valuing people - the OMA family feeling
4. Building relationships with customers and suppliers through long-term commitments and face-to-face contacts.

The Code of Ethics addresses these core areas:

- ◆ Corporate Ethics
- ◆ OMA staff, customers & suppliers
- ◆ OMA environment
- ◆ Anti-Bribery and Corruption
- ◆ Political Contribution
- ◆ Conflict of Interest

## CORPORATE ETHICS

1. Respects and abides by the laws and cultural practices of the countries in which it operates.
2. Values the diversity of its staff and their willingness and capacity to work together to achieve common goals.
3. Provides a work environment free from discrimination and harassment based on age, ancestry, marital status, medical condition, mental disability, physical disability, national origin, race, religion, gender, sexual orientation.

## OMA STAFF

1. Staff at all levels work together cooperatively in a spirit of trust built on honest communication and fairness.
2. Healthy competition and clear communication are valued and supported.
3. Staff do not seek to gain advantage over each other by devious means such as uttering falsehoods and indulging in malicious gossip.
4. Staff respect the property of OMA and of their colleagues.
5. Managers ensure that staff are trained appropriately for their jobs and that health and safety standards are given priority in the workplace.
6. Managers support the honest endeavours of staff to improve themselves.
7. Managers recognise that staff members are connected to families and that the well-being of the family has an impact on the ability of a staff member to work effectively.

## OMA CUSTOMERS

1. OMA managers and staff do all within their power to meet the needs of customers and exceed their expectations and seek to create long term relationships wherever possible.
2. OMA managers and staff deal honestly with customers.
3. OMA managers and staff will commit no crime at the behest of customers.

## OMA SUPPLIERS

1. OMA values long-term relationships with suppliers.
2. OMA values and supports suppliers who refuse to use bribery or corrupt practices to win OMA business.

## OMA ENVIRONMENT

1. The OMA Group is committed to creating a healthy work environment for all staff and are committed over the long term to creating a more sustainable environment through the development of effective recycling and waste management policies and practices.

## ANTI BRIBERY AND CORRUPTION

1. In accordance with international laws OMA strictly forbids any facilitation payments being made on its behalf.
2. This includes responding to demands from third parties for goods or cash payments in return for performing their responsibilities.
3. OMA will not authorise or accept any costs or reimbursement requests relating to facilitation payments.

## POLITICAL CONTRIBUTION

1. The use of company resources for contributions to any political party or candidate is prohibited, both direct contributions and indirect assistance or support. We also prohibit the use of our facilities for political purposes.

## CONFLICT OF INTEREST

1. OMA Group conducts its business according to the principle that it must manage conflict of interest fairly and in a transparent way.
2. Our policy is to take all reasonable steps to maintain and operate effective organizational and administrative arrangements to identify and manage relevant conflicts.
3. Senior management are responsible for ensuring that our systems, control, and procedures are adequate to identify and manage conflicts of interest.

Gerrit Van der Merwe, Group Managing Director, June 2017