The Implats code of ethics (the code) has been approved by the Group’s board of directors (the board) and senior management and is binding on every employee, officer, director, contractor and supplier and on all officers and directors of any entity owned or controlled by Implats.

The board gives effect to the code by subscribing to the following values and principles: Implats is committed to minimising adverse impacts on the environment, health and safety and subscribes voluntarily to the most stringent legal prescriptions. No discrimination on any individual or group will be allowed on any arbitrary basis and all employees have the right of freedom of association and fair treatment.

For all employment-based decisions, the only legitimate criteria are an individual’s performance, capability and potential subject to the requirements.

Employees, suppliers and contractors are required to ensure the highest possible standards of environmental control and adhere to the best contemporary practice to ensure a safe work environment for all employees.

**Board Recommended Practices**

- Set direction for ethics in organisation
- Approve codes of conduct, ethics policies and ensure inclusion of all stakeholders and key ethical risks
- Delegate implementation of code and assume ongoing oversight management
- Discuss management of ethics, monitoring and focus areas and ethical outcomes

**Ethics**

- Fairness and integrity in all business dealings
- Respect for human rights and dignity of all people
- Care for health and safety of all stakeholders
- Embracing diversity
- Honesty, transparency and accountability
- Adherence to sound standards of corporate governance and all applicable laws

**All Approvals and Declarations to be Made To**

- Any member of the board
- The chairman of the NGE committee
- Any member of Exco
- Senior employees of Implats
- All other employees of Implats