

## **BOXER SUPERSTORES CODE OF ETHICS FOR SUPPLIERS**

### **INTRODUCTION**

The ***Boxer Superstores Code of Ethics for Suppliers***, sets out the minimum ethical, social and business practices that Boxer Superstores requires of its Suppliers, whether they operate internationally or only within the Republic of South Africa.

For the purposes of the ***Boxer Superstores Code of Ethics for Suppliers***, a “Supplier” is deemed to be any third party in the form of a bidder, vendor, contractor, consultant, agent or intermediary that is supplying goods or services to Boxer Superstores, or making an offer to supply goods or services in the form of a bid/ tender/ quotation or proposal, or that has been awarded a contract for the supply of goods and/ or services to Boxer Superstores.

Suppliers must ensure that the ***Boxer Superstores Code of Ethics for Suppliers*** is communicated throughout their organisation and to their sub-contractors to ensure compliance is enforced at all times.

Contravention of the ***Boxer Superstores Code of Ethics for Suppliers*** is regarded as a serious matter and may result in termination of the business relationship and/ or possible civil or criminal proceedings.

### **HUMAN RIGHTS**

Boxer Superstores is committed to respecting human rights and will not participate in or be party to any activities that support, promote or enable the abuse of human rights and we accordingly expect our Suppliers to practice the same approach.

Boxer Superstores has a zero tolerance standard for harassment, discrimination, human trafficking, child and force labour and human rights violations.

### **FORCED LABOUR**

Suppliers shall not use work that is performed involuntarily under threat of penalty, including forced overtime, human trafficking, debt bondage, forced prison labour, slavery or servitude. Suppliers shall not withhold migrant workers identification documents without a reasonable and rational legal basis.

## **CHILD LABOUR**

Suppliers shall not employ children at an age where education is still compulsory. Children under the age of 15 (in the absence of a legal stipulation) or below the stipulated minimum age, shall not be employed.

## **LABOUR & DISCRIMINATION**

Suppliers are required to comply with all applicable labour laws of the countries in which they are registered, resident and/ or in which they operate and all applicable international labour laws.

Suppliers must prohibit all forms of discrimination based on, but not limited to, race, religion, culture, gender, age, political opinion, social origin, pregnancy and maternity, sexual orientation, gender identity or expression, or any other arbitrary means. In summary, company policies, procedures and processes must promote inclusivity, equality and fairness, in line with relevant labour related legislation. These include, but are not limited to the following: Labour Relations Act No. 66 of 1995, Basic Conditions of Employment Act No. 77 of 1997, Employment Equity Act No. 55 of 1998, Skills Development Act No. 97 of 1999 and their relevant amendments as gazetted; and where applicable.

## **HEALTH & SAFETY**

Suppliers are required to provide a safe and healthy work environment for all employees working at their sites.

In addition, any employee or representative of the Supplier visiting a Boxer Superstores premises, is required to adhere to Boxer Superstores safety standards and site rules.

## **CONFLICT OF INTEREST**

A Supplier is obliged to immediately declare any conflicts of interest or potential conflicts of interest that may arise or any other information which a contracting party in the position of Boxer Superstores would reasonably wish to be informed about, including without limitation to employment of family members and any business with related parties, or personal relationships between its employees and the employees of Boxer Superstores.

## **CONFIDENTIAL INFORMATION**

The Supplier shall not use for their own purposes or disclose to any third party Boxer Superstores' intellectual property, trade secrets or other confidential, proprietary or sensitive information without the prior written consent of Boxer Superstores.

## **PRIVACY & PROTECTION OF PERSONAL INFORMATION**

Boxer Superstores requires Suppliers to implement the principles of relevant data protection laws, including having reasonable and appropriate technical and organisational measures in place to prevent unauthorised access to personal information.

The privacy of stakeholders of Boxer Superstores is of utmost importance to us, for information on how we process and secure personal information, please see [our data privacy statement](#).

## **COMPETITION LAWS**

Boxer Superstores believes that fair competition is fundamental to free enterprise. We do not engage in anti-competitive practices and we encourage fair competition amongst our Suppliers and potential Suppliers. Boxer Superstores requires that all Supplier conduct their business in full compliance with all applicable laws intended to promote free and fair competition and do not enter into prohibited agreements or practices, formal or informal, such as price fixing, market sharing bid rigging, collusion and "kickbacks".

## **BRIBERY, CORRUPTION AND UNETHICAL BEHAVIOUR**

Boxer Superstores shall not give or accept secret commissions or bribes, nor be involved in any corrupt or illegal benefits for the purpose of influencing an official act or decision in order to obtain or retain business or secure an improper advantage. As a South African based company, we are bound to, and comply with, with the laws of South Africa, specifically The Prevention and Combating of Corrupt Activities Act No. 12 of 2004 (PCCS) in this regard.

Any Supplier of Boxer Superstores that bribes or attempts to bribe a Boxer Superstores employee shall be de-listed.

Any other unethical behaviour by a Supplier will be dealt with in a similar manner to the above.

## **GRATIFICATION**

Suppliers should be aware that it is not permissible for employees of Boxer Superstores to give or receive gifts and/ or hospitality of favours that could influence any business decision or that creates the impression of influencing such decision.

Suppliers are therefore advised not to provide gifts, hospitality or favours to any Boxer Superstores employee, their family members or friends other than the following:

- Promotional material/ merchandise, such as diaries and calendars;
- Reasonable business entertainment such as business breakfasts, lunches, cocktail parties or dinners;
- Personal hospitality to events such as sporting events or theatres;
- Business conferences and/ or seminars.

Where Suppliers offer to pay for any hospitality offer to pay for hospitality and/ or travel costs for business related events, written authority must be obtained from the Commercial Group Executive prior to the event.

All gratification must be disclosed and will be recorded in a Gift Register, established by Boxer Superstores Management

It is recognised that where a business relationship has developed into a personal friendship, which exists outside of the working relationship, then personal gifts are likely to be exchanged (E.g. birthdays, retirement, Christmas). This is permissible provided that gifts are paid for by the individual, not the Supplier.

## **SUSTAINABILTY**

Boxer Superstores is committed to the principle of sustainable development, by which is meant striking an optimal balance between economic, environmental and social development and will strive to innovate and adopt best practice, working in consultation with its stakeholders. Boxer Superstores recognises the need for sustainability to:

- Minimise consumption of natural resources and waste generation;
- Minimise the impact of operations on the environment;
- Maximise recycling where possible;

Boxer Superstores requires Suppliers to share its commitments to sustainability and adhere to the relevant legislation, including but not limited to the following: Consumer Protection Act No.68 of 2008, National Environmental Management Act No. 107 of 1998 and the Extended Producer Responsibility Regulations of 2020.

## **ANIMAL WELFARE**

Boxer Superstores recognises the importance of protecting the welfare of animals during the production of all our products, and are committed to ensuring that all animals in our supply chain are treated humanely and with respect. Suppliers are, therefore, expected to apply all reasonable efforts to ensure that animals under their care (or the care of their subcontractors and other supply chain partners) are treated in a humane manner by minimizing any potential harm, stress or pain to animals.

## **POLITICAL**

Boxer Superstores has a neutral stance in terms of political support. Therefore no payments or use of Boxer Superstores time or resources, may be made in favour of any one political party.

## **COMMUNICATION & WHISTLEBLOWING**

Suppliers are encouraged to raise any queries, concerns and complaints regarding any illegal, non-compliant, fraudulent or unethical behaviour by reporting same through Boxer Superstores tip-off line or the other reporting mechanisms as set out in the table below:

TOLL FREE:	0800 11 32 38
FAX:	0800 00 77 88
POST:	KZN 138, Umhlanga Rocks, 4320
EMAIL:	<a href="mailto:boxer@tip-offs.com">boxer@tip-offs.com</a>

An independent party manages the tip-off mechanisms, ensuring anonymity and confidentiality.