



## Code of Ethics and Business Conduct

**Barko Developments (Pty) Ltd Registration Number: 2004/007079/07**

**NHRBC 28199  
VAT NO: 475 021 2245**

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## 1. Purpose and Scope

The Code of Ethics and Business Conduct ("the Code") outlines the principles and standards that guide the behaviour and actions of all employees, officers, directors, and representatives of Barko Developments (Pty) Ltd (Barko), a citrus producing and property letting company operating in South Africa. Adherence to these principles is fundamental to our commitment to integrity, transparency, and ethical business practices.

## 2. Compliance with Laws and Regulations

At Barko, we are committed to complying with all applicable laws, regulations, and legal requirements in South Africa, including those related to citrus farming, property letting, environmental protection, labour practices, and consumer rights.

## 3. Integrity and Honesty

We conduct all business activities with honesty, integrity, and fairness.

We do not engage in deceptive, fraudulent, or unethical practices, including bribery, corruption, or conflicts of interest.

We accurately record and report financial and non-financial information in accordance with applicable laws and accounting standards.

## 4. Respect for Stakeholders

We treat all stakeholders with respect, dignity, and fairness, including employees, customers, suppliers, shareholders, and local communities.

We do not discriminate on the basis of race, ethnicity, gender, religion, age, disability, sexual orientation, or any other protected characteristic.

We respect the rights and privacy of individuals and protect confidential information entrusted to us.

## 5. Environmental Responsibility

We are committed to minimizing our environmental impact and promoting sustainability in our citrus farming and property letting operations.

We comply with environmental laws and regulations, implement sustainable practices, and strive to conserve natural resources.

We continuously seek opportunities to reduce waste, mitigate pollution, and protect biodiversity in our operations.

## 6. Health and Safety

We prioritize the health, safety, and well-being of our employees, customers, and communities.

We provide a safe and healthy work environment, adhere to occupational health and safety standards, and implement appropriate risk management measures.

We promote awareness and training on health and safety practices to prevent accidents and injuries.

## 7. Conflict of Interest

We avoid conflicts of interest that may compromise our judgment, impartiality, or loyalty to the company.

We disclose and manage conflicts of interest promptly and transparently, seeking guidance from appropriate channels when necessary.

## 8. Fair Competition

We compete fairly and ethically in the marketplace, respecting laws and regulations governing competition and antitrust practices.

We do not engage in anti-competitive behaviour, such as price-fixing, market manipulation, or collusion with competitors.

## 9. Protection of Company Assets

We safeguard company assets and resources, including physical property, intellectual property, proprietary information, and financial assets.

We use company assets responsibly and ethically, avoiding misuse, theft, or unauthorized disclosure.

## 10. Reporting Violations

We encourage employees to report any violations or concerns regarding this Code of Ethics and Business Conduct, company policies, or legal requirements.

We provide multiple channels for reporting, including anonymous reporting options, and ensure protection against retaliation for whistleblowers.

## 11. Conclusion

Adherence to this Code of Ethics and Business Conduct is fundamental to Barko's success and reputation. Every employee, officer, director, and agent are responsible for upholding these principles in their daily actions. Failure to do so may result in disciplinary action, up to and including termination of employment. If you have any questions or concerns regarding the interpretation or application of this Code, please consult your supervisor or Barko's Ethics Committee.

This Code is subject to periodic review and update to ensure its alignment with South African laws and regulations, as well as changes in our business environment.

## 12. Review Date Schedule

### DOCUMENT VERSION MANAGEMENT

Version	Drafted by	Date drafted	Approved by	Approval by Forum	Date approved
1	Mr Joe de Wet	25 March 2024	Chairperson of SEC	Board of Directors	15 May 2024

Version	Drafted by	Date
1	Company Secretary	25 March 2024