



The United Basalt Products Ltd.

CODE OF ETHICS



PREAMBLE

This **Code of Ethics** (the “Code”) relates to **The United Basalt Products Limited** (the “Company”) and applies to the Company as well as to its subsidiaries. In this Code, the term “Group” refers to the Company and its subsidiaries. The term “employee” includes directors.

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MESSAGE OF THE CHIEF EXECUTIVE OFFICER

Dear Colleagues,

I am pleased to present to you the **Code of Ethics**, which has been drafted in accordance with the deeply held values and principles of our Group. Over the years our Group has built and maintained public confidence by being committed to conducting business with passion and integrity. To keep pace with the challenges of the business world, upholding our values and behaving in an ethical manner are becoming even more critical.

This Code has been drafted to guide our behavior and decisions and to put our values into actions. I am confident that with your support, the sustainable development of our Group will be assured and the trust of our stakeholders in our activities will be maintained.

Thank you in advance for your ongoing commitment to our shared values and your valuable contribution to our business success.

Stéphane Ulcoq

Chief Executive Officer

1. INTRODUCTION

The Group is committed to the highest level of ethical conduct, integrity, and fairness in its dealings.

This Code enunciates the core values pursued by the Group and its employees and sets out the required standards of conduct for both internal relations and external interactions.

The Code has been endorsed by the Board of Directors of the Company on 12 November 2015. The Group expects all employees to share its commitment to high moral, ethical and legal standards.

2. CORE VALUES

2.1 INTEGRITY

We commit to the highest standard of business ethics by upholding honest, impartial, transparent and loyal conduct.

2.2 RESPECT

We show tolerance towards others whilst respecting the person, his ideas and belongings.

We respect the values, customs and traditions of each other and the diversity that flows within the Group.

2.3 CITIZENSHIP

We act as responsible citizens and aim to contribute in the development of sustainable projects and protection of the environment, to promote the well-being of the community at large.

2.4 INNOVATION

We work with passion while promoting novelty and creativity and by being receptive to new ideas, to ensure the sustainable evolution of the Group.

2.5 PROFESSIONALISM

We fully dedicate our skills in the performance of our duties to ensure customer satisfaction and uphold the credibility of the Group.

2.6 EXCELLENCE

We pursue excellence and strive to provide products and services with uncompromising quality.

3. ETHICAL PRINCIPLES OF THE GROUP

3.1 PERSONAL CONDUCT

We must observe the applicable laws, rules and regulations of Mauritius and other countries where the Group operates. We must also adhere to the Group's policies, rules and regulations applicable to our specific roles.

We must be honest, fair, impartial, courteous and efficient in our dealings with stakeholders. We must treat colleagues with courtesy and respect and actively foster a high quality and efficient work environment. We must also act professionally with other stakeholders, such as customers, shareholders and suppliers.

We are aware that our conduct when off duty can reflect on the Group's reputation and we must ensure that, whether on or off duty, our behavior does not adversely affect the Group's reputation. Our conduct must reflect our integrity and devotion to the best interests of the Group and its stakeholders and uphold the credibility of the Group.

3.2 USE OF INFORMATION AND CONFIDENTIALITY

We understand that confidential information includes any information in any form relating to the Group and related bodies, clients or businesses and which is not in the public domain.

We must use confidential information, to which we are granted access during our employment, only in the performance of our duties and in the best interests of the Group and not for personal advantage or for the benefit of any person or entity. We understand that the Group strictly prohibits the improper use of any confidential information by us.

We have the responsibility to retain information for so long as necessary and as required by law and to ensure that information under our control or to which we have access, is properly safeguarded.

We must not divulge any other confidential information, while in employment with the Group and thereafter, without the written consent of the Company, other than as required by law.

Failure to comply with the above policies may result in disciplinary sanctions including dismissal and the Company may pursue monetary damages or other remedies.

3.3 USE OF THE GROUP'S RESOURCES

The Group's resources, including time, assets and information must be used in a sensible and lawful manner, solely for its benefit. We understand that if we improperly use the Group's resources or give, sell, rent or dispose of these, we shall be liable to sanctions.

3.4 GROUP'S FUNDS

The funds belonging to the Group must only be used for its benefit. We understand that if we misuse Group's funds, we shall be liable to sanctions.

If our position requires us to spend the funds of the Group or incur any reimbursable personal expenditure, we must exercise good judgement to ensure that a fair value is received for expenses incurred.

We understand that if we have access to the Group's funds in any form, we must diligently record and handle the funds. The Group strictly prohibits fraud and dishonesty. If we become aware of any evidence of fraud and dishonesty, we should immediately report by following the Group's whistleblowing policy.

3.5 CORRUPTION

The Group strictly prohibits the offering/acceptance of a payment, such as kickbacks, secret commissions and any other irregular payments, and/or of anything of value in exchange of a business favor or with the intention to influence the action taken by any individual or agency or to gain any competitive or improper business advantage.

3.6 OFFERING AND ACCEPTING GIFTS AND/OR FAVORS

We must not ask for any gift and/or favor from anyone if these shall have an influence on the way we perform our duty.

We must not accept and/or offer any gift and/or favor, that goes beyond common courtesies associated with acceptable business practices.

Common business courtesies must be restricted to:

- Novelty or advertising items – e.g. items that are widely distributed such as inexpensive calendars, pens and other promotional items;
- Occasional business entertainment – e.g. cocktail parties or dinner; and
- Occasional hospitality – e.g. tickets to sporting events or theatres.

In the event declining the gift and/or favor appears impolite, we must seek and heed the guidance of the Ethics Officer.

Any gifts/favors above Rs 1000 must be reported to the Ethics Officer, who shall proceed in accordance with the Group's gift policy.

While moderate business entertaining is acceptable, we must guard against hospitality that appears to be aimed at influencing us in the way we perform our duties. Whenever possible, hospitality should be reciprocated.

3.7 CONFLICT OF INTEREST

We must act in good faith and perform our duties diligently, honestly and in accordance with the best interests of the Group.

We must not allow our personal, professional or business interest to conflict with our official duties in the Group. If we have an interest that influences, may influence or appears to influence the way we perform our duties, we must immediately declare that interest to the Ethics Officer and take appropriate steps to resolve the conflict of interest.

We must ensure that our respective dealings with customers, suppliers, contractors and colleagues do not place us in a position of obligation that may lead to a conflict of interest.

Failure to declare a potential, actual or perceived conflict of interest or to take remedial action agreed with the Company, in a timely manner and in accordance with the Group's conflict of interest policy, may result in disciplinary actions including dismissal.

3.8 OUTSIDE EMPLOYMENT

We understand that we cannot set up or engage in private business or undertake any other employment in direct or indirect competition with the Group, whether remunerated or not, on a permanent or temporary basis.

We must request the approval of our immediate supervisor before taking any employment other than that for which we are currently remunerated.

3.9 HEALTH, SAFETY AND WELFARE

The Group is committed to implement a positive health and safety culture by ensuring that the working environment is safe and healthy for all the employees and other individuals on the premises of the Group, in order to protect and improve their working lives, to achieve and comply with all legal requirements and to enhance the corporate image of the Group.

We must comply with the local occupational health and safety laws as well as the rules and regulations of the Group.

We must take reasonable care of our own health and safety and co-operate with the Group on matters pertaining to health and safety and that of others on the premises of the Group. We must not interfere with or misuse anything provided for our health and safety or that of colleagues or visitors.

3.10 EQUAL OPPORTUNITY POLICY, DIGNITY AND PRIVACY

The Group follows the recommendations of the Equal Opportunities Commission (EOC) and is committed to be an equal opportunity employer by providing a workplace free from discrimination, harassment and bullying.

The Group is committed to provide equality of opportunity and treatment for all its employees in recruitment, training, promotion, transfer, benefits and discipline, without discrimination based on any personal characteristics as enunciated by the Employment Rights Act.

We must report any behavior that constitutes discrimination, harassment or bullying in accordance with the Group's whistleblowing policy. Such behavior will not be tolerated and lead to action being taken, which include dismissal. We understand that we will not be victimized or treated unfairly for raising an issue or making a complaint.

The Group safeguards the privacy and confidentiality of employee records and ensures that the dignity and individuality of each employee are respected.

3.11 COMMUNICATION

It is the policy of the Group to provide its stakeholders with relevant, timely and accurate information, in accordance with prevailing laws, rules and regulations. Channels of communication that foster an atmosphere of mutual trust and respect between the Group and its stakeholders are open.

We must communicate in a timely, accurate, appropriate and courteous manner and respond promptly to all proper requests for information and complaints.

The Group prohibits its employees, contractors or sub-contractors to engage in social media as its representative unless a written approval/consent of management is obtained. If any employee, contractor or sub-contractor of the Group is directed to contribute to or participate in any form of social media related work, they must act in a professional manner at all times, in the best interests of the Group and must not disclose any confidential information.

4. ETHICAL OBLIGATION TOWARDS STAKEHOLDERS

4.1 SHAREHOLDER AND THE FINANCIAL COMMUNITY

We aim to achieve sustainable return on the investment of shareholders through productive, efficient and innovative operations.

We acknowledge that shareholders and potential shareholders are entitled to timely and accurate information, necessary to evaluate their investment and to be able to take decisions in full awareness of their implications. The Group's policy is to ensure that there is timely disclosure of true and accurate information pertaining to the state of affairs of the Group, in accordance with prevailing laws, rules and regulations.

It is the policy of the Group to maintain complete and accurate records and accounts and present them in accordance with all applicable laws and professional accounting standards. False, artificial or misleading statements or entries are not permissible in the books, accounts, records, documents or financial statements of the Group.

4.2 CUSTOMERS AND CONSUMERS

We must ensure that an efficient and courteous service is provided to customers.

It is the policy of the Group to disclose its capabilities, without any misrepresentation, exaggeration and overstatement, to customers in a clear and unequivocal manner.

We aim to provide customers with products that meet high standards of safety, quality and reliability and take responsibility for products that fail to meet these required standards.

4.3 COMPETITORS, SUPPLIERS AND CONTRACTORS

We promote fair and open competition and treat our competitors honorably.

We aspire to develop and maintain long term relationships with suppliers and contractors based on mutual trust.

We must ensure that the procurement of supplies and services is done to the highest ethical standard, to assure a quality end product and the continued confidence of customers, suppliers and the public.

We must ensure that the hire of services and the purchase of goods are based solely on price, quality, service and need.

We must also make sure that the suppliers and contractors are paid on time and according to agreed terms of trade.

4.4 COMMUNITY

The Group is committed to play an active role in society and contribute in the development of sustainable projects to promote the well-being of the community at large. The Group encourages the participation of employees in community activities and civic affairs.

We promote the respect and preservation of the environment and are committed to sustainable development by producing, handling and disposing all materials in compliance with the law and in a responsible manner without creating risk to human health and the environment.

The Group endorses the democratic principles of Mauritius. Contributions to political organizations or electoral candidates are made in accordance with all applicable laws and are disclosed in the Group Annual Report.

5. COMPLIANCE AND ENFORCEMENT

Compliance with the Code is mandatory for the employees of the Group.

We must ensure that we understand and comply with the Code. When encountering an ethical issue, for which an appropriate solution may seem unclear, the following questions may help assess the issue:

What is the potential ethics issue I face?

Could I potentially violate:

- A law or regulation?
- The Group's core values?
- The Group's Code of Ethics?
- The Group's policies and procedures?
- An ethical standard of my profession?
- My personal sense of ethical conduct?

What are my specific responsibilities in this situation?

- What are my ethical responsibilities as an employee of the Group?
- What are the ethical responsibilities of my job?

What resources can help me resolve this issue?

- Relevant laws and regulations
- The core values of the Group
- The Code of Ethics of the Group
- The policies and procedures of the Group, for instance the Employee's Handbook
- Professional standards

What possible course of action should I choose and what would be the implications?

- How would I explain my actions to my colleagues?
- How would my action look if the facts appeared on the front page of a newspaper?
- How might others want to be treated?

If we are unable to resolve the matter, we shall successively seek guidance from our immediate supervisor, our manager and the Ethics Officer.

If we believe that we are required to act in a way that is contrary to the standards set out in this Code or believe that others are breaching the Code, we should report the matter by following the Group's whistleblowing policy. The Group will ensure, to the best of its capacity, that no prejudice whatsoever is endured by an employee who makes such a report on reasonable grounds or in good faith.

Channels of complaint are also open to shareholders and potential shareholders, customers and consumers, suppliers, contractors of the Group. Complaints will be considered objectively and efficiently.

The Group will consider any violation of the Code as a serious matter. Any breach of the Code will be dealt with promptly.

6. DISSEMINATION AND AMENDMENT

The Code shall be distributed to the existing employees and to each new employee of the Group, upon commencement of his or her employment with the Group. Suggestions for improving the Code must be made to the Ethics Officer. The Group reserves the right to amend, alter or terminate the Code at any time.

ACKNOWLEDGEMENT FORM

I, the undersigned, acknowledge receipt of the Code of Ethics (the “Code”) of The United Basalt Products Limited.

I declare that I have read, understood and agree to abide by the terms of the Code.

Name : _____

Job Title : _____

Signature : _____

Date : _____

