

Opicorp (PTY) Ltd T/A Auto Carriers

Consolidated Company Policies

1. Introduction

Opicorp (Pty) Limited T/A Auto Carriers is dedicated to upholding high standards of integrity, safety, and responsibility in all our operations. This document outlines our company policies, providing a unified framework for our employees, contractors, suppliers, and partners. Our commitment to excellence is demonstrated through our Road Transport Management System (RTMS) certification, which guides our approach to health, safety, environmental management, and overall operational efficiency. This consolidated policy is intended to be a practical guide to our principles and practices.

2. Code of Conduct and Business Ethics

2.1 Anti-Corruption and Anti-Money Laundering

Purpose

Opicorp (PTY) Limited T/A Auto Carriers is committed to conducting its business in an ethical and lawful manner. This Anti-Corruption Policy aims to ensure that all employees, directors, officers, agents, and third parties acting on behalf of Opicorp (PTY) Limited T/A Auto Carriers understand and comply with anti-corruption laws and regulations, thereby preventing any form of bribery or corruption within the company.



Scope

This policy applies to all employees, directors, officers, agents, contractors, consultants, and any third parties acting on behalf of Opicorp (PTY) Limited T/A Auto Carriers. It covers all business activities, including interactions with government officials, private sector clients, and other business partners.

Definition of Corruption

Corruption is defined as the abuse of entrusted power for private gain. It includes bribery, which is the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty.

Prohibited Conduct

Opicorp (PTY) Limited T/A Auto Carriers strictly prohibits any form of bribery or corruption, including but not limited to:

- Offering, promising, giving, or authorizing others to give anything of value to any government official or private sector client to influence a decision or gain an improper advantage.
- Requesting, agreeing to receive, or accepting anything of value from any person or entity in return for an improper advantage or to influence a decision.
- Making facilitation payments, which are small unofficial payments to expedite routine government actions.

Gifts and Hospitality

Employees and representatives of Opicorp (PTY) Limited T/A Auto Carriers may offer or accept reasonable and appropriate gifts and hospitality, provided that:

- They are not intended to influence a business decision or secure an improper advantage.
- They are given in an open and transparent manner.
- They comply with local laws and regulations.
- They do not exceed reasonable and customary business practice.



Any gift or hospitality that exceeds a nominal value (R 1 000) must be reported to the Compliance Officer and recorded in the company's gift and hospitality register.

Charitable Contributions and Sponsorships

Opicorp (PTY) Limited T/A Auto Carriers supports charitable contributions and sponsorships that are legal and ethical under local laws and practices. However, such contributions must not be made to obtain or retain business or secure an improper advantage. All charitable contributions and sponsorships must be approved by the Accountant and a Section 18A certificate obtained.

Political Contributions

Opicorp (PTY) Limited T/A Auto Carriers does not make political contributions. Employees and representatives must not use company funds or resources to make political contributions.

Due Diligence and Third-Party Compliance

Opicorp (PTY) Limited T/A Auto Carriers will conduct appropriate due diligence on third parties, including agents, consultants, contractors, and business partners, to ensure they comply with anti-corruption laws and this policy. Contracts with third parties must include provisions to prevent bribery and corruption.

Training and Communication

All employees and relevant third parties will receive regular training on this Anti-Corruption Policy and related anti-corruption laws. The policy will be communicated to all employees, directors, officers, agents, and business partners.



Reporting and Whistleblowing

Employees and third parties are encouraged to report any suspected or actual violations of this policy. Reports can be made confidentially and anonymously to the Compliance Officer (Accountant) or through the company's whistleblowing hotline. Opicorp (PTY) Limited T/A Auto Carriers prohibits retaliation against anyone who reports a violation in good faith.

Compliance Officer

The Compliance Officer (Accountant) is responsible for overseeing the implementation of this policy, conducting regular audits, and providing guidance on anti-corruption matters. The Compliance Officer will also maintain the gift and hospitality register and ensure appropriate due diligence is conducted on third parties.

Consequences of Non-Compliance

Violations of this Anti-Corruption Policy may result in disciplinary action, including termination of employment or contract, and may also lead to legal proceedings. Opicorp (PTY) Limited T/A Auto Carriers will cooperate fully with law enforcement authorities in the investigation and prosecution of any acts of corruption.

Review and Updates

This policy will be reviewed annually and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

Approval and Implementation

This Anti-Corruption Policy has been approved by the Directors of Opicorp (PTY) Limited T/A Auto Carriers. All employees, directors, officers, agents, and third parties are required to adhere to this policy and ensure its implementation in all business activities.



2.2 Whistleblowing and Protection Against Retaliation

Purpose

Opicorp (PTY) Limited T/A Auto Carriers is committed to maintaining the highest standards of integrity, transparency, and accountability in all aspects of its operations. The Whistle Blower Policy is intended to encourage and enable employees, suppliers, and other stakeholders to raise serious concerns internally so that Opicorp (PTY) Limited T/A Auto Carriers can address and correct inappropriate conduct and actions. This policy provides a process for reporting concerns without fear of retaliation.

Scope

This policy applies to all employees, contractors, suppliers, and other stakeholders of Opicorp (PTY) Limited T/A Auto Carriers.

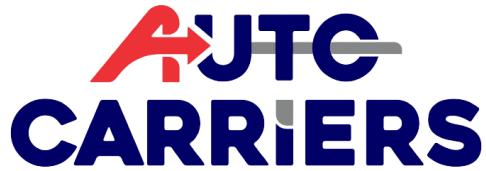
Definitions

- ****Whistle Blower:**** Any individual who reports concerns related to unethical, illegal, or improper conduct within the company.
- ****Protected Disclosure:**** Any communication made in good faith that discloses or demonstrates an intention to disclose information that may evidence unethical or improper conduct.

Reporting Concerns

Concerns should be reported in writing and may be submitted anonymously. The report should include:

- A description of the concern, including relevant facts and supporting documentation if available
- The names of individuals involved
- The date and location of the incident



Reports can be submitted through the following channels:

- Email: david.roberts@autocarriers.co.za

Handling of Reports

All reports will be taken seriously and investigated promptly and thoroughly. The Whistle Blower Officer is responsible for coordinating the investigation of all reported concerns. Upon receipt of a report, the Whistle Blower Officer will acknowledge receipt to the Whistle Blower, if contact information is provided. The investigation will be conducted in a fair and unbiased manner, respecting the rights of all parties involved. The outcome of the investigation will be documented, and appropriate corrective action will be taken if necessary.

Protection Against Retaliation

Opicorp (PTY) Limited T/A Auto Carriers strictly prohibits any form of retaliation against Whistle Blowers who make a Protected Disclosure in good faith. Any employee who retaliates against a Whistle Blower will be subject to disciplinary action, up to and including termination of employment.

Confidentiality

All reports and the identity of the Whistle Blower will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation and to comply with legal requirements.



False Reporting

Any individual who knowingly makes a false report or provides false information with the intent to deceive will be subject to disciplinary action, up to and including termination of employment or contract termination.

Communication of Policy

This policy will be communicated to all employees, contractors, suppliers, and other stakeholders. It will also be available on the company's website and intranet.

Review of Policy

This policy will be reviewed periodically by the Board of Directors to ensure its effectiveness and compliance with legal requirements. Amendments to the policy will be made as necessary.

3. Health, Safety, Environmental and Quality (SHEQ) Policy

Opicorp (Pty) Limited T/A Auto Carriers acknowledges that the health and safety of its employees, contractors, customers and the communities in which it operates is of paramount importance and cannot be compromised. Each employee is empowered and expected to demonstrate a pro-active attitude and approach towards ensuring that reasonable care is taken for their own health and safety as well as that of fellow employees, contractors and visitors. All drivers receive an annual medical exam and support should they have any chronic ailments.

As part of Opicorp (Pty) Limited T/A Auto Carriers Integrated Logistics commitment towards sustainability and good corporate governance, it strives to minimise and mitigate the impact of its operations on the environment in a sensible, responsible and legally compliant manner. We will continually strive to prevent pollution and foster an awareness and concern for the protection of the environment.



Quality is an integral part of Opicorp (Pty) Limited T/A Auto Carriers Business Principles. These principles guide our actions and commitment to deliver quality services that are safe, compliant and preferred to our internal and external customers.

Opicorp (Pty) Limited T/A Auto Carriers aims to perform and to achieve a Health, Safety, Environmental and Quality standards to the extent that we will receive recognition for our accomplishments on a regional, national and on an international level.

Health, Safety, Environmental and Quality Management will be a “Way of Life” throughout the Company.

3.1 Health and Safety Management System

Our company has a health and safety management system in place, which is integrated with our RTMS certification. This system includes:

- Personal Protective Equipment (PPE): We have a policy that outlines our principles regarding Personal Protective Equipment.
- Machine Safety: We have a policy that outlines our principles regarding Machine Safety.
- Emergency Preparedness: We have a policy that outlines our principles regarding Emergency Preparedness.
- Workplace Ergonomics: We have a policy that outlines our principles regarding Workplace Ergonomics.
- Handling of chemical and/or biological substances: We have a policy that outlines our principles regarding the handling of chemical and/or biological substances.
- Fire Protection: We have a policy that outlines our principles regarding Fire Protection.



4. Operational Policies

4.1 Driver Communication Policy

To all Drivers:

You are reminded that you are not allowed to use your handheld cellular device while driving, without a hands-free device or Bluetooth. Texting is not allowed in any form, while driving. This is the policy of the company and by law. Controllers will communicate with you via read out text messages from the WebFleet system. They will only call you on your cellular device for emergencies which you can answer ONLY if you are using a handheld device or Bluetooth. Alternatively, you can stop at the next safest place to return the call. This is for your safety and the safety of other road users. Habitual offenders will be monitored, and consequence management will be applied.

BE SAFE....

Commencement of the policy

This policy will commence with immediate effect. It replaces all other communication policies (whether written or not).

This policy applies to:

All employees of the Company (whether full-time, part-time or casual) and all persons performing work at the direction of, or on behalf of the Company (for example contractors, subcontractors, agents, consultants, and temporary staff) (collectively referred to as "workers").

All of the Company's workplaces and to other places where workers may be working or representing the Company for example, when visiting a customer, client or supplier or in the case of a driver any time that he is on duty meaning from the time he arrives at site of loading until he returns to depot (collectively referred to as "workplace").



This Policy does not form part of any employee's contract of service, nor does it form part of any contract for service.

4.2 Driving Hours Policy

Objective: To ensure the safety of our drivers, protect our assets, and comply with relevant transportation regulations, we establish the following policy regarding driving hours.

Scope: This policy applies to all drivers employed by Opicorp (PTY) Limited T/A Auto Carriers who operate car carrier vehicles.

Policy Statement

Maximum Driving Hours:

Drivers may not exceed a total of 12 hours of driving in any single day.

Minimum Sleep Requirement:

Every driver must ensure they have a minimum of 6 hours of sleep each day.

All driving must stop between 11 PM to 5 AM or between 10 PM to 4 AM to ensure adequate rest.

Record Keeping:

Drivers must accurately log their driving hours, breaks, rest periods, and sleep hours in compliance with the company's record-keeping system.

The logs must be submitted to the fleet manager weekly (or per trip for longhaul) for review.



Compliance:

Drivers are expected to adhere strictly to this policy. Any violations may result in disciplinary action, up to and including termination of employment.

Regular training will be provided to ensure all drivers understand and comply with this policy.

Responsibilities:

- Fleet Managers: Ensure compliance with this policy, review logs, and provide regular training.
- Drivers: Adhere to the prescribed driving hours, take required breaks, rest periods, and ensure they have adequate sleep, maintaining accurate logs.

4.3 Drug and Alcohol Policy

Opicorp (PTY) Limited T/A Auto Carriers is committed to providing a safe and healthy work environment in which all workers are treated fairly, with dignity and respect. The use of drugs and alcohol may impact on an individual's capacity to perform work safely, efficiently and with respect, thereby posing a risk to the health and safety of the individual and others. This is more especially true for drivers of heavy vehicles as these are quite dangerous when driven under the influence.

This policy outlines the Company's commitment to safe work and is aimed at preventing, or minimising, any risk of injury or harm to the health and safety of its workers, or others at the workplace, or on the road, from the use of alcohol or drugs. It describes the standards of behaviour expected in relation to the use of drugs and alcohol, the responsibilities of the Company and its workers and the consequences of breaching the policy.

Road transport carries a huge burden of responsibility and drug and alcohol usage in this instance will not be condoned in any circumstances.



Commencement of the policy

This policy will commence with immediate effect. It replaces all other drug and alcohol policies (whether written or not).

Scope

This policy applies to:

1. All employees of the Company (whether full-time, part-time or casual) and all persons performing work at the direction of, or on behalf of the Company (for example contractors, subcontractors, agents, consultants, and temporary staff) (collectively referred to as "workers").
2. All of the Company's workplaces and to other places where workers may be working or representing the Company for example, when visiting a customer, client or supplier or in the case of a driver any time that he is on duty meaning from the time he arrives at site of loading until he returns to depot (collectively referred to as "workplace").

This Policy does not form part of any employee's contract of service, nor does it form part of any contract for service.

Definitions

The following are terms used in policy:

"Drugs" - include illegal drugs, prescription or pharmacy drugs, or synthetic drugs as defined below.

"Illegal drugs" - includes:

- Any drug prohibited law.
- Prescription or pharmacy drugs (as defined below) which are used without the necessary prescription or for non-medical purposes.
- Any synthetic drug (whether prohibited by law or not), being a psychoactive herbal and/or chemical product which, when consumed, mimics the effects of a prohibited drug, for example synthetic cannabis.



“Management” means the Company’s managers, supervisors, team leaders (whichever are relevant) and all employees with supervisory responsibilities.

“Prescription drugs” - means lawful drugs which are prescribed by a medical practitioner for a diagnosed medical purpose and issued by a pharmacist.

“Pharmacy drugs” – means drugs which are lawfully available at pharmacies (without a prescription) and are required for a legitimate medical purpose.

“under the influence” – means that a person’s faculties are impaired by the use of drugs or alcohol to the extent that the person is unfit to be entrusted with a duty they perform, or may be called on to perform, with efficiency and safety to themselves and others.

Responsibilities

Worker’s responsibilities

3. All workers must:
 - a) comply with this policy
 - b) observe all directions from the Company in regards to this policy
 - c) recognise that performance of duties could be affected by alcohol or drugs; and
 - d) Immediately notify management if they are aware of any breach of this policy by another worker. Subject to any disclosures required by law, any notifications received by management will be treated confidentially. Failure to report any breach of this policy by another worker may itself constitute a breach of this policy.

4. Except as set out in this Policy, workers must not:
 - a) attend work, commence work, continue work or return to work having consumed alcohol and/or drugs



- b) consume drugs and/or alcohol at the workplace
- c) Must not possess, distribute, sell, use or consume illegal drugs in the workplace or while on duty. Such conduct constitutes serious misconduct. It may also constitute a criminal offence, in which case the Company may notify the police, or other appropriate government authority.
- d) work or drive while under the influence of drugs or alcohol.
- e) attend work, commence or return to work while under the influence of alcohol and/or drugs.
- f) consume alcohol and/or drugs during work, or at the workplace (note qualification for prescription and pharmacy drugs below).
- g) Must not possess, distribute, sell, use or consume illegal drugs in the workplace or while driving duties. Such conduct constitutes serious misconduct. It may also constitute a criminal offence, in which case the Company may notify the police, or other appropriate government authority.

Responsibilities of Management

- a) Management is responsible for ensuring that this policy is implemented in their area. This includes ensuring that:
- b) All workers are made aware and understand this policy.
- c) Risk assessments are undertaken on work tasks in consultation with workers and/or work health and safety representatives.
- d) The behaviour of workers is observed to ensure adherence with the policy.



- e) Any concerns or issues are addressed proactively and expediently to ensure the health and safety of all workers.
- f) Support is provided to workers where appropriate; and
- g) Any suspected breaches of this policy are acted on promptly and in accordance with this policy.

Some Specific Situations include:

Prescription and Pharmacy drugs

- 5. Where a worker is taking prescription or pharmacy drugs for medical purposes, the worker will not breach this policy by attending work, if the worker:
 - a) takes the prescription and pharmacy drugs in accordance with the instructions of their medical practitioner and normal directions applying to the use of those drugs.
 - b) does not misuse or abuse the use of prescription or pharmacy drugs.
 - c) ensures they are able to perform their work effectively, competently and safely.
 - d) informs themselves of the impact of consumption of alcohol with prescription and pharmacy drugs and they limit consumption accordingly.
 - e) Checks with their medical practitioner or pharmacist about the effect of the drug on their ability to drive vehicles operate machinery and safely perform their normal work duties. If a workers ability to perform work competently, efficiently and safely is affected, the worker should obtain this advice in writing from the medical practitioner, or pharmacist, and provide it to their manager or supervisor as soon as possible and before undertaking their work.



6. If the Company suspects that the workers ability to safely perform work is affected, the Company may take steps to address the issue in accordance with this policy.
7. The Company has a legal obligation to provide a safe and healthy working environment for its workers and others in the workplace. To ensure a safe environment, no vehicle, whether it belongs to the Company or client is to be operated or used by anyone who is under the influence of alcohol or used or consumed illegal drugs. The Alcohol percentage allowed to a worker is to be 0.00%.
8. The Company will not accept liability for any damage to a Company vehicle, an injury to another person, or damage to other property caused by a worker's use of a Company vehicle while intoxicated from alcohol or illegal drugs. The worker will be personally liable in such circumstances.

Smoking

Smoking is not permitted at any of the Company's workplaces, except in specifically designated areas.

What will the Company do if it suspects a worker is affected by drugs or alcohol?

If the Company suspects, on reasonable grounds, that a worker is under the influence of drugs or alcohol in breach of this policy, the Company will take steps to address the issue. Reasonable grounds may include (but are not limited to) where the worker:

- Is unable to co-ordinate their actions.
- Has red or bloodshot eyes, or dilated pupils.
- Smells of alcohol.
- Acts contrary to their normal behaviour.
- Exceeds alcohol concentration limits applicable to the task they perform or may be called on to perform.



- Is not behaving in a professional and competent manner and in accordance with the Company standards.
- Otherwise appears to be impaired or affected by drugs or alcohol.

In these circumstances, the company may take the following actions (however they are not limited to these actions):

- Direct the worker to go home. Suitable arrangements for safe transport will be made by the relevant manager.
- Direct the worker to attend a medical examination to determine whether the worker is fit to perform their duties effectively and safely. The medical examination may include a drug and/or alcohol test, such as a breath test, blood test, urine test or oral swab. In relation to prescription or pharmacy drugs, the Company may require evidence as part of the medical examination about the effects and proper use of the drug. The worker may be directed to go home following the medical examination.
- If the worker refuses to attend a medical examination, they will be directed to go home. Refusal to attend a medical examination, refusal to go home, or providing false information constitutes a breach of this policy and may result in action being taken against the worker, including action as set out below under 'Breach of policy'.
- Where a worker is sent home, or required to attend a medical examination, the worker must report to Management (or as directed) on the next working day, or as soon as possible once the worker is no longer under the influence of drugs or alcohol. The Company will deal with the issue as set out below under 'Breach of policy'. Failure to report constitutes a breach of this policy.

What will the Company do if it finds drug or alcohol at the Company's workplace or in a vehicle?

If the Company finds drugs or alcohol at the workplace in breach of this policy, the Company may take the following action, which includes but is not limited to:

- Investigate the matter to attempt to determine who is responsible, including by conducting searches, as set out in this policy.



- Require some or all workers, to undergo a medical examination to test for the presence of drugs or alcohol.

Workers are required to co-operate in any investigation. Failure to co-operate, or providing false information in an investigation, constitutes a breach of this policy and may result in action as set out below under 'Breach of this policy'.

What will the Company do if it suspects a worker has drugs or alcohol in their possession at work?

If the Company suspects that a worker has drugs or alcohol in their possession at work the Company may take the following action, which includes but is not limited to:

- Investigate the matter to attempt to determine whether the worker does have such drugs or alcohol in their possession.
- Request the worker to open their locker, bag, or vehicle or to empty their pockets or jacket for the purpose of locating any drugs or alcohol.

Workers are expected to permit such inspection and co-operate with the Company's investigation. Failure to co-operate, or providing false information in an investigation, may result in action being taken against the worker, as set out below under 'Breach of this policy'.

When an employee is caught by an Officer of the Law under the influence of alcohol or illegal substance, or in possession, or conveying or distributing same:

The employee will be subjected to the full weight of the law as well as applicable disciplinary action separately. The legal and disciplinary processes are separate and mutually exclusive in influence, although evidence from one may be used in the other. The findings and remedial/punitive actions may differ materially.



When will the Company conduct drug and alcohol testing?

Definitions:

The following definitions will apply to this part:

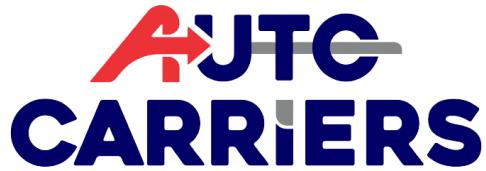
“Alcohol Screen Test” - means any analytical procedure or test which is carried out on a worker to determine the presence and/or the concentration alcohol (including but not limited to a breath test, urine sample, oral swab and blood test). These procedures are not limited to those which presently exist. As new technology is developed these may also be used for alcohol testing purposes.

“Authorised Officer” - means a suitably trained, qualified and authorised person from an Independent Testing Agency or a suitably trained, qualified and authorised person appointed by the Company or client for the purposes of undertaking or arranging an Alcohol Screen Test and/or Drug Screen Test.

“Confirmatory Test”: means any analytical procedure or test which is undertaken after a first Alcohol Screen Test or Drug Screen Test, which is used to verify the presence of drugs or alcohol. This may include, but is not limited to the following:

- a test applied to a second Sample of a worker’s urine
- a test applied to any oral swab taken from a worker
- a second Breath Test
- Analysis of a worker’s blood.

“Drug Screen Test”: means any analytical procedure or test which is carried out on a worker to determine the presence and/or the concentration of any drug (including but not limited to a breath test, urine sample, oral swab and blood test). These procedures are not limited to those which presently exist. As new technology is developed this may also be used for drug testing purposes.



"Sample" – in relation to urine, includes, if the sample is divided into portions, a portion of the sample.

Drug and alcohol testing

1) The Company may require workers to undergo testing for the presence of drugs or alcohol at random, with or without, prior notice or

a) Causal based.

i. If the Company suspects, on reasonable grounds, that a worker is under the influence of drugs or alcohol in breach of this policy.

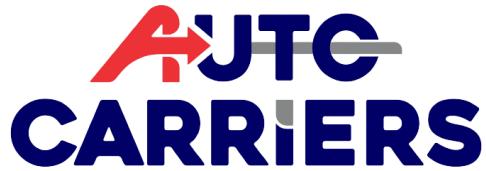
ii. Upon finding evidence that a worker has used, possessed, sold, solicited or transferred drugs whilst in the workplace or while on Company property.

iii. Where the Company finds drugs or alcohol in the workplace in breach of this Policy.

iv. Upon receipt of a report that a worker has used, possessed, sold, solicited or transferred drugs while in the workplace or on Company property.

b) Post-incident/accident.

i. Following any incident or accident where the actions of a worker, or a worker's physical or mental condition, may have been a contributing factor.



ii. This includes any incident or accident involving a Company vehicle or a worker driving their own vehicle on Company business.

c) Pre-employment/pre-contract.

i. As part of the Company's recruitment and selection process, the Company may require a potential worker to undergo a drug and alcohol test.

ii. A potential worker who returns a positive test for drugs or alcohol will not be engaged by the Company.

d) Return to work.

i. Where a worker has previously returned a positive test for drugs or alcohol, the Company may require the worker to undergo a drug and alcohol test before returning to work.

What happens if a worker returns a positive test for drugs or alcohol?

If a worker returns a positive test for drugs or alcohol, the Company will:

9. Advise the worker of the result.
10. Stand the worker down from duty immediately.
11. Meet with the worker to discuss the results. The worker may have a support person present at the meeting.
12. Provide the worker with an opportunity to explain the results.



13. If the worker is unable to provide a satisfactory explanation for the positive result, the Company will take action in accordance with the 'Breach of policy' section of this policy.

Breach of policy

A breach of this policy may result in disciplinary action being taken against the worker. The disciplinary action will depend on the circumstances of the breach, but may include:

- counselling
- a warning
- suspension from work (with or without pay)
- termination of employment or engagement.

Assistance for workers

The Company is committed to assisting workers who may be experiencing problems with drugs or alcohol. The Company encourages workers to seek assistance before their work performance is affected. Any worker who seeks assistance will be treated with confidentiality and will not be disciplined for seeking assistance.

Confidentiality

The Company will maintain confidentiality in relation to any worker who is experiencing problems with drugs or alcohol, and in relation to any drug or alcohol testing. However, the Company may be required to disclose information in certain circumstances, for example, where there is a risk to the health and safety of the worker or others, or where required by law.



4.4 Fatigue Policy

Fatigue management is the responsibility of every driver and the planner/controller. The planner will plan each trip considering the driver's previous trip and rest periods. A minimum of 9 hours rest is recommended between long haul trips. It is the responsibility of the driver to ensure that he is well rested at the commencement of a trip. This requires discipline and commitment. No matter how good the planning is, without co-operation of the driver safe practices cannot be assured.

There is a no-driving late at night policy which prohibits driving between 10pm and 4am. This means that there is an operational window of 18 hours in a day. This does not mean that a driver can drive for 18 hours. It allows a driver opportunity to schedule his rest time and start up time to meet his own health and wellbeing as well as the delivery schedule. A driver must not exceed 15 hours a day from start up to shut down for the day. For example, a driver starting off at 4 am must park off for the day at 7 pm, but a driver starting up at 7am may drive to 10pm.

During a trip, the driver should stop and take a walk around the truck doing a casual inspection of truck, trailer and cargo every 3 hours or 240 km taking a 15 minute break. At any point in a road journey, should a driver feel tired or a loss in concentration, the driver should pull over and stop at the nearest safe stopping area. The driver should then rest for a few hours before continuing his journey. The delay should be communicated to the planner who will update the client.

Fatigue management is key to safe driving. Ultimately it is the driver's responsibility, and it his life at stake. No cutting corners!



4.5 Hijacking Awareness and Response Policy

The following Anti-Hijacking Awareness Guidelines will assist drivers in preventing a hijacking and handling a situation after being hijacked.

A fixed driving route should be designated by the planner. If a deviation from route is necessary due to construction or an accident, the controller should be notified immediately.

The Driver should be aware of safe areas in case they believe they are being targeted.

Remember there is safety in motion, be cautious/aware when in motion, but know the most dangerous times for hijacking are when the truck is stopped and or parked off.

Know or learn the route, especially if it's a new route or if there is a new drop off point added to the route.

Where possible, try stopping at a different place each trip.

Do not stop to help motorists in trouble.

Never pick up hitchhikers.

Be aware of your surroundings, watch for suspicious vehicles enroute to your destination and at the drop-off point. Be aware of vehicles "following" you on the highway or parked vehicles with occupants at the drop off point.

Only stop in designated rest areas where there are other trucks parked.

Unlock the truck for as short a time as possible when stopped to rest, eat or make a delivery.

Lock the truck every time you make a stop. Lock the cab and roll up the windows when parked or in slow moving traffic.

Keep a 24Hour emergency telephone number with you at all times. This can be saved on your phone or written down and kept in your wallet.



Steps to follow if you have been hijacked

In the event of a hijacking or any emergency situation, immediately locate and press the panic button installed in the truck.

The panic button is easily accessible and located either on the dashboard or by the cab bed.

After activating the panic button, you should remain as calm as possible and wait for a call from the security supervisor for assistance. If possible, answer the call and remain calm.

During the call with the security supervisor or any other authority, you must use the code word broken to indicate that you are in immediate danger.

Any mention of the code word Broken signifies an urgent need for assistance due to hijacking or imminent danger. Example if the security supervisor asks you if you are okay you can reply with "yes I am okay but my TomTom is Broken".

While awaiting assistance, you should comply with any instructions given by the hijackers to ensure personal safety.

If possible, you should attempt to gather information discreetly, such as vehicle descriptions, license plate numbers, or landmarks that could assist authorities in locating the truck.

You should remain vigilante and monitor the surroundings for any opportunities to communicate with authorities or escape from the situation safely.

4.6 Overloading Policy

1. Background

Overloading is recognized to be both a safety concern as well as a cost concern. Economic growth demands an adequate transport infrastructure. Overloaded vehicles, especially freight vehicles, are destroying our roads, impacting negatively on economic growth – the damage caused grows exponentially as the load increases. Damage to



roads because of overloading leads to higher maintenance and repair costs and shortens the life of a road which in turn places an additional burden on the state as well as law abiding road users who ultimately carry the costs of careless and inconsiderate overloading. If the problem of overloading is not controlled, this cost must be carried by the road user, which will require significant increases in road user charges such as the fuel levy, vehicles license fees, and overloading fines to mention just a few. Overloading is a safety hazard that leads to unnecessary loss of life, and the rapid deterioration of our roads, resulting in increased maintenance and transportation costs.

2. The risks to road safety posed by Overloading

Overloading contribute to many fatal accidents on our roads as well as threaten road safety. The overloaded vehicle will not only put the driver at risk but also other road users.

Overloading will pose the following risks:

- Less stability on the road and increased stopping duration.
- Tyres will overheat and wear rapidly which increases the chance of blowouts.
- The Drivers control over an overloaded vehicle is diminished which increases the chance of an accident.
- The overloaded vehicle loses the ability to accelerate as normal and makes it difficult to overtake.
- An overloaded vehicle leads to a higher maintenance cost to the vehicle(Brakes, tyres, shock absorbers and a higher fuel consumption).

3. Overloading Tolerance

Opicorp (PTY) Limited T/A Auto Carriers has a no overloading Policy.

Every time a vehicle is loaded it is imperative that the drivers check for dimensional compliance, and should a load be non-compliant adjustments would need to be made.



4.7 Speeding Policy

Opicorp (PTY) Limited T/A Auto Carriers maintains a strict policy against speeding to prioritize safety and environmental responsibility. Our commitment to this policy is unwavering, and we want all drivers to understand its importance. Speed monitoring is by fleet telematics.

Monitoring and Accountability:

Every vehicle is equipped with satellite tracking, and each trip is closely monitored. If any driver is found to be exceeding the speed limit, appropriate actions will be taken, as outlined above.

Safety Awareness:

It's crucial that our drivers not only grasp the legal consequences of speeding but also comprehend the safety implications. Speeding significantly increases the risk of accidents, endangering lives and well-being. Moreover, it has a detrimental impact on carbon emissions and fuel consumption.

Financial Responsibility:

Drivers caught speeding will be held financially responsible for any fines incurred, which may be deducted from their salaries.

Variable Speed Limits:

Please note that the national speed limit for trucks is 80 km/h. However, vehicle permits may impose lower speed limits based on road conditions and cargo. In such cases, the lowest indicated speed limit applies. Additionally, drivers must be attentive to speed reductions in built-up or urban areas, where children and pedestrians may be present.



Wildlife Caution:

Many national and cross-border routes pose the risk of encounters with livestock or game, especially during dawn or dusk. To mitigate these risks, drivers are advised to exercise vigilance and drive at speeds below the posted limit under such conditions.

Prioritize Caution:

In all situations, driver judgment should lean toward maintaining lower speeds to ensure safety, protect the environment, and uphold our commitment to responsible driving.

Speeding Consequences

1-10 Kms over, Verbal counselling; 3x verbal counselling escalates to a written warning; 3 written warnings escalate to a final written warning; any further violation escalates to a hearing | Written warning: Three written warnings will lead to a final written warning. Any subsequent violations will result in a formal hearing. Final written warning; any further violation escalates to a hearing.

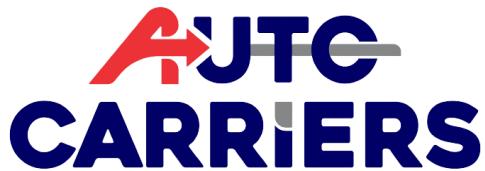
10-20 Kms over, Written warning: Three written warnings will lead to a final written warning. Any subsequent violations will result in a formal hearing | Final written warning; any further violation escalates to a hearing

21-30 Kms Final written warning; any further violation escalates to a hearing towards dismissal

>30 Kms over leads to a disciplinary hearing, possibly dismissal

4.8 Tyre Policy (NS Repair)

14. Puncture repair is the 1st option, if unable to repair and a new tyre needs to be fitted, refer to number 2
15. If a new tyre is required, consent must be obtained from the person logging the breakdown, i.e Mr Ramesh Mohan or Mohamed Sha.



16. In the event of a new tyre being fitted, the old tyre must be left with our driver (provided there is space available)
17. Should there not be any space, the technician is to transport the tyre to his depot.
18. All branches undertaking repairs must take photographs and provide failure reports, this must be emailed to Ramesh and Mohamed Sha.
19. Reports will be used to determine if a tyre is to be collected or scrapped.

5. Environmental Policy

Our company has a formal environmental policy which includes a commitment to legal compliance, continuous measurement and continuous improvements in environmental performance. As an RTMS certified company, we have an environmental management system in place. Annual training on Environmental stewardship for key employees.

The RTMS system includes:

- GHG Emissions: We conduct greenhouse gas (GHG) emissions accounting and report to our clients. We are implementing a decarbonization strategy with the goal of a 20% reduction in fuel consumption per trip against a 2020 baseline. This is in line with SBTi and GLEC 3.0 standards
- Energy Efficiency: We have a policy that outlines our principles regarding Energy Efficiency. Low power Led lights are in use in the office
- Renewable Energy: We have a strong interest in transitioning to solar for the office in the long term
- Decarbonisation: Our target is 20% reduction vs 2020 baseline for transport operations
- Water quality, consumption and management: We have a filtration system to ensure water quality, consumption and management.
- Air quality: Our targets for fuel consumption reduction correlates with particulate emissions reduction
- Responsible chemical management: All chemicals on site have data sheets and appropriate handling and caution is exercised.
- Sustainable resources management: We encourage all employees to ensure Sustainable resources management
- Waste reduction: We segregate and recycle waste where appropriate
- Reuse and recycling: We have a strong focus on recycling and waste reduction



- Animal welfare: We encourage humane treatment of all animals
- Biodiversity, land use and deforestation: We strive to enhance Biodiversity, land use and limit our impact in deforestation.
- Soil quality: We strive to have minimal adverse impact on Soil quality.
- Noise emissions: We strive to minimize noise impacts. All trucks have OE grade exhaust systems.

We also organise training on environmental management.

6. Supplier CSR/Sustainability Requirements

Our company sets CSR/Sustainability requirements towards suppliers. We communicate these requirements to our suppliers and use a self-assessment questionnaire to identify whether suppliers fulfil our CSR/sustainability requirements. Our supplier sustainability requirements cover:

- Child labour and young workers
- Wages and benefits
- Working hours
- Modern slavery (i.e. slavery, servitude and forced or compulsory labour and human trafficking)
- Ethical recruiting
- Freedom of association and collective bargaining
- Non-discrimination and harassment
- Women's Rights
- Diversity, Equity, and Inclusion
- Rights of Minorities and Indigenous Peoples
- Land, Forest and Water Rights and Forced Eviction
- Use of Private or Public Security Forces
- Health and safety
- Anti-Corruption and Anti-Money Laundering
- Data Protection and Data Security
- Financial responsibility (Accurate Records)
- Disclosure of Information
- Fair competition and anti-trust
- Conflicts of interest



- Counterfeit parts
- Intellectual property
- Export controls and economic sanctions
- Whistleblowing and protection against retaliation
- GHG emissions
- Energy efficiency
- Renewable energy
- Decarbonisation
- Water quality, consumption and management
- Air quality
- Responsible chemical management
- Sustainable resources management
- Waste reduction
- Reuse and recycling
- Animal welfare
- Biodiversity, land use and deforestation
- Soil quality
- Noise emissions

7. Human Rights Policy

7.1 Commitment to Human Rights

Opicorp (Pty) Limited T/A Auto Carriers is committed to respecting and promoting human rights throughout our operations and supply chain. We recognize our responsibility to conduct business in a manner that respects the dignity, rights, and freedoms of all individuals.

BEE legislation and certification ensures that employment aligns with population demographics.

The company strives to uphold the law as regards human rights

Everyone is entitled to respect and dignity in the workplace irrespective of race, sex, religion or other diversity criteria.



All employees will be remunerated according to the Bargaining Council Main Agreement. The rights of the individual will be respected.
No human rights violations will be tolerated.

7.2 Identified Human Rights Risks

Through our RTMS certification process and operational assessments, we have identified the following human rights risks relevant to our road transport operations:

Labor Rights Risks:

- Working hours and fatigue management for drivers
- Fair wages and benefits
- Freedom of association and collective bargaining
- Non-discrimination and harassment in the workplace

Health and Safety Risks:

- Driver safety on the road
- Workplace accidents and injuries
- Exposure to hazardous conditions

Supply Chain Risks:

- Potential for forced labor or modern slavery in our supply chain
- Child labor in supplier operations
- Unethical recruiting practices

Community Risks:

- Impact of our operations on local communities
- Road safety for other road users and pedestrians



7.3 Existing Measures to Address Human Rights Risks

Our company has already implemented several measures to address identified human rights risks:

Labor Rights Protection:

- Comprehensive Code of Conduct that prohibits discrimination, harassment, and unfair treatment
- Driving Hours Policy limiting maximum driving time to 12 hours per day
- Fatigue Policy requiring minimum 9 hours rest between long haul trips
- No-driving policy between 10pm-4am to ensure adequate rest
- Grievance procedure allowing employees to raise concerns without fear of retaliation
- Whistleblower Policy protecting employees who report violations

Health and Safety Measures:

- RTMS certification demonstrating commitment to health and safety management
- Drug and Alcohol Policy with zero tolerance for impaired driving
- Personal Protective Equipment requirements
- Emergency preparedness procedures
- Hijacking Awareness and Response Policy for driver security
- Regular vehicle safety inspections and maintenance

Fair Employment Practices:

- Transparent disciplinary procedures with progressive discipline approach
- Right to representation in disciplinary matters
- Fair compensation structures
- Regular training and communication on policies

Supply Chain Due Diligence:

- Supplier CSR/Sustainability requirements communicated to all suppliers



- Self-assessment questionnaires to evaluate supplier compliance
- Due diligence on third parties including contractors and business partners

7.4 Future Measures to Manage Human Rights Risks

We are committed to continuous improvement in managing human rights risks. Our planned future measures include:

Enhanced Monitoring:

- Continue to review and update our human rights risk assessment as part of our RTMS certification process
- Monitor compliance with labor standards through our existing management systems
- Track and analyze incidents related to human rights issues

Capacity Building:

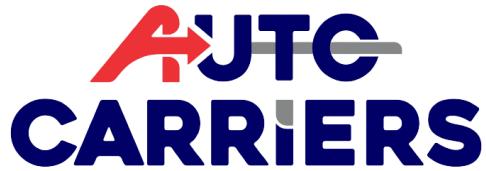
- Provide ongoing training to employees on human rights principles and our policies
- Educate management on identifying and addressing human rights risks
- Engage with drivers and employees to understand their concerns

Supply Chain Engagement:

- Continue to communicate our expectations to suppliers regarding human rights
- Use self-assessment tools to evaluate supplier performance
- Encourage suppliers to implement similar standards in their own operations

Stakeholder Engagement:

- Maintain open channels for employees to raise concerns through our grievance and whistleblower mechanisms
- Engage with industry associations on human rights best practices in road transport
- Respond to stakeholder concerns in a timely and transparent manner



Continuous Improvement:

- Review the effectiveness of our existing measures on an ongoing basis
- Update policies and procedures as needed to address emerging risks
- Integrate human rights considerations into business decision-making

7.5 Remediation and Accountability

If human rights violations are identified, we will:

- Investigate all reports promptly and thoroughly
- Take appropriate corrective action, including disciplinary measures where warranted
- Provide remediation to affected individuals where appropriate
- Cooperate with relevant authorities as required by law
- Learn from incidents to prevent recurrence

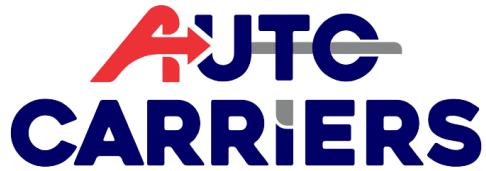
8. Additional Business Ethics Principles

8.1 Data Protection and Data Security

We are committed to protecting the personal data of our employees, customers, and business partners. We handle all personal information in accordance with applicable data protection laws and maintain appropriate security measures to prevent unauthorized access, disclosure, or misuse of data. Self Assessment forms for both internal and new vendors.

Key Principles:

- Collect only necessary personal data for legitimate business purposes
- Store data securely and limit access to authorized personnel
- Respect individual privacy rights
- Comply with data protection regulations applicable to our operations



8.2 Financial Responsibility and Accurate Records

We maintain accurate and complete financial records in accordance with applicable accounting standards and legal requirements. All employees are expected to ensure that company records are truthful, accurate, and complete.

Key Principles:

- Record all transactions accurately and in a timely manner
- Maintain supporting documentation for financial transactions
- Prohibit falsification of records or misrepresentation of financial information
- Cooperate fully with internal and external audits

8.3 Disclosure of Information

We are committed to transparent communication with stakeholders while protecting confidential business information. We provide accurate information to regulators, customers, and other stakeholders as required by law and good business practice.

8.4 Fair Competition and Anti-Trust

We compete fairly and ethically in the marketplace. We do not engage in anti-competitive practices such as price-fixing, market allocation, or bid-rigging. We comply with all applicable competition and anti-trust laws.

Key Principles:

- Compete on the merits of our services
- Do not enter into agreements that restrict competition
- Respect the competitive process
- Comply with tender and procurement regulations



8.5 Conflicts of Interest

Employees must avoid situations where personal interests conflict with the interests of the company. Any potential conflicts of interest must be disclosed to management.

Key Principles:

- Disclose any financial interests in suppliers, customers, or competitors
- Do not use company position for personal gain
- Avoid business dealings with family members or close associates without disclosure
- Make business decisions based on the company's best interests

8.6 Counterfeit Parts

We are committed to using only genuine parts and components in our vehicles and equipment. We do not knowingly purchase or use counterfeit parts, as they compromise safety and quality.

Key Principles:

- Source parts from reputable suppliers
- Verify authenticity of critical components
- Report suspected counterfeit parts to management
- Maintain records of parts and suppliers

8.7 Intellectual Property

We respect the intellectual property rights of others and expect others to respect our intellectual property. We do not use unlicensed software, copyrighted materials, or patented processes without proper authorization.

Key Principles:

- Use only licensed software and properly authorized materials
- Respect trademarks, patents, and copyrights of others



- Protect our own intellectual property and confidential information
- Comply with licensing agreements and terms of use

8.8 Export Controls and Economic Sanctions

We comply with all applicable export control laws and economic sanctions. We do not engage in business with sanctioned countries, entities, or individuals as prohibited by law.

Key Principles:

- Screen business partners against sanctions lists
- Comply with export and import regulations
- Do not facilitate prohibited transactions
- Seek guidance when uncertain about sanctions compliance

9. Review and Updates

All policies contained in this document are reviewed periodically to ensure their continued effectiveness and compliance with applicable laws and regulations. Updates are made as necessary to address emerging risks, regulatory changes, and stakeholder expectations.

Our RTMS certification process provides a framework for continuous improvement in health, safety, environmental, and quality management. We are committed to maintaining high standards of corporate responsibility while operating efficiently and sustainably.