

BARLOWORLD ENVIRONMENTAL POLICY

Preamble

Barloworld is a distributor of leading international brands providing integrated rental, fleet management, product support and logistics solutions.

By representing leading global original equipment manufacturers and brands, Barloworld participates in supply chains that support and align to our environmental and sustainability objectives.

As a responsible corporate citizen Barloworld:

- Appreciates the importance of good environmental stewardship
- Recognises that abuse of the environment is a serious threat to sustainability
- Encourages all its stakeholders to consider positive steps they may take with regards to environmental stewardship
- Participates in its value-chain to promote environmental awareness, good environmental stewardship and appropriate responses
- Incorporates environmental stewardship and related considerations in its strategic framework under Sustainable development, one of the group's six strategic focus areas.

This approach aligns with the group's Code of Ethics, its Worldwide Code of Conduct, the Barloworld Climate Change Policy, the Barloworld Energy Efficiency Policy, the Barloworld Water Use and Management Policy, the Barloworld Waste Management Policy and with its commitment to being a responsible corporate.

Policy

Barloworld strives to minimise the impacts of its operations on the environment. Environmental considerations form an integral part of daily business activities, including risk management, strategic planning, capital expenditure and operating procedures.

Barloworld has established clear reporting structures in all divisions that culminate in compliance with relevant legislation and adherence to this policy. Material non-compliance will be reported to the Risk and Sustainability Committee, and thereafter to the Board of Directors.

In all its divisions throughout the group, Barloworld will publish divisional Environmental Policies appropriate to the business of each division, subordinate to this company policy, which will, inter alia:

- Establish clear accountability for environmental performance with top management, as a part of good corporate governance
- Require compliance with relevant environmental laws, other standards and codes of practice to which the company subscribes

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- Where practicable, ensure optimisation of resource utilisation and minimise greenhouse gas emissions and waste
- Ensure that environmental considerations form part of the company's overall risk management processes
- Promote environmental awareness within company operations
- Require the maintenance of open dialogue with stakeholders to promote environmental protection and rehabilitation
- Develop contingency procedures to deal with unscheduled occurrences and community concerns.

Environmental Management Systems will be implemented in all divisions to guide environmental responsibility and accountability at all levels of management and continual improvement of environmental performance through self-assessment and auditing.

Barloworld will continue to assess its physical, regulatory, reputational and financial risks associated with the environment and, where practicable, adapt its operations, processes and procedures accordingly. It will also pursue relevant identified opportunities where practicable.

All material aspects related to the environment are reportable to the Barloworld Risk and Sustainability Committee, a sub-committee of the Barloworld Board of Directors.

All operations within the Barloworld Group are expected to uphold the principles contained within this policy which is to be read in conjunction with the Barloworld Climate Change Policy, the Barloworld Energy Efficiency Policy, the Barloworld Water Use and Management Policy and the Barloworld Waste Management Policy.

Barloworld is committed to measuring and reporting its progress in terms of this policy.

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GUIDING PRINCIPLES THAT GOVERN BARLOWORLD ENVIRONMENTAL MANAGEMENT

1. The Chief Executive Officer and Board of Directors in each division are the environmental champions and are responsible and accountable for environmental management.
2. Environmental management is an integral part of the daily system of the company and is recognised as one of the corporate priorities. Processes are in place to ensure that the Chief Executive Officer and Board of Directors are fully informed about pertinent environmental issues.
3. Relevant and quantifiable objectives and targets are set by each division to address significant environmental impacts that have been identified.
4. Environmental performance indicators are measured and monitored. Each division should continuously seek ways to better manage and improve its environmental performance.
5. Barloworld is cognisant of its responsibility for all its products and services, raw material usage and disposal of waste products after use. Where practicable Barloworld will make sustainable use of renewable resources and, wherever practicable, use renewable or recyclable materials. In addition, the company will promote the efficient and optimal use of finite resources and energy, thereby conserving such resources. In this regard:
 - All divisions will strive to conserve energy and improve the energy efficiency of the operation and of the products and services sold
 - Barloworld will strive to make continual progress towards eliminating the release of substances that may cause environmental damage to air, water or soil, ecosystems and people
 - The company will reduce and, where practicable, eliminate waste through source reduction and recycling. All waste will be handled and disposed of through safe and responsible methods.
6. Environmental risk assessments will form part of significant new projects and of the planning phase for modifications to existing operations.
7. Barloworld will strive to minimise the environmental, health and safety risks to employees and the communities in which the company operates through safe technologies, facilities and operating procedures.
8. All operations will be prepared for emergencies. Barloworld divisions will inform, in a timely manner, anyone who may be affected by conditions caused by the company that might endanger the environment.

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