



# BUSINESS ETHICS POLICY

Policy name	Business Ethics Policy
Applicable to	All staff
Person responsible	Shane Strydom
Policy number	
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### Business Ethics Policy

Our approach to being a good corporate citizen

Company is committed to being a good corporate citizen. Taking into account the economic, social and environmental impact of our business, we strive to maximise the benefits and minimise any negative impact of our operations. We aim to stand out as an organisation that lives up to the highest level of business ethics, and accordingly we must be beyond reproach in all that we do. At all times, Company's business conduct, whether in relation to staff, clients, suppliers, shareholders, or the public at large, must be honest, earning and deserving the trust and respect of all stakeholders.

#### *Human rights*

- Company supports the principles of Human Rights and we are committed to upholding these principles in our policies, procedures and practices. Respect for human rights is and will remain integral to our operations.
- We will endeavour to work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct. We will work with customers to ensure that contractual requirements do not infringe human rights.
- We will take measures to ensure that the work of our employees does not compromise national and internationally accepted human rights conventions, whilst recognising and respecting the diversity in local cultures across the different cultural spectrums in which we operate.

#### *The environment*

We will conduct our business with respect and consideration for the environment, and strive to minimise the environmental impact of our operations.

#### *Local communities*

Company is committed to supporting and assisting the communities in which we operate through a variety of means, including charitable fund-raising, sponsorship of community projects and voluntary work. We conduct our business with respect and consideration for local communities. We will also serve local interests by providing employment opportunities and dependable services and products.

Our standards of business practice

We are committed to high ethical standards in our business dealings to ensure the integrity of our employees and our organisation is maintained.

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### *Bribery and corruption*

- Company is resolutely opposed to bribery and corruption in whatever form it may take. Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are modest in value and cannot be interpreted as inducements to trade. Where there is doubt, guidance should be sought from the relevant Company Director. No financial or other inducements are to be solicited from or given to third party organisations or to individuals from such organisations in any circumstances, including government agencies and representatives.
- Sales of the Company's services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of Company, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.
- Employees are not to accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift must be declared to the company and, if practical, donated to an appropriate charity.

### *Political contributions*

Company does not make contributions to political parties.

### *Treatment of customers*

Mutual trust and confidence between Company and our customers is vital. All employees are required to strive to consistently deliver service excellence and value for money, meeting customers' expectations and anticipating their changing requirements.

### *Internal suppliers*

Any business transactions between Company subsidiaries for the supply of goods or services are to be based on normal "arm's length" business principles. These principles should cover pricing and other contractual terms and must be as defensible as those to which independent parties might be expected to agree.

### *External suppliers*

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to secure Company business. It is our policy to pay suppliers on time in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy.

### *Competition*

Company will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors and their product and services should not be disparaged. When in contact with competitors, employees are to avoid discussing confidential information and must make no attempt to improperly acquire competitors' trade secrets or any other confidential information. Employees must not discuss pricing strategies or undertake any arrangements or practices which would conflict with the laws applicable to the business concerned.

### *Our approach to corporate governance*

Company is committed to protecting the interests of our shareholders and our organisation through compliance with the relevant legal and regulatory environments and careful management of our business risks.

### *Compliance with the law*

- Company will comply fully with all relevant national and international laws and will act in accordance with local guidelines and regulations that govern our operations, including those that are industry specific.

- It is the responsibility of all employees to ensure, where appropriate, that they are aware of all laws and regulations that may affect the area of the business in which they are engaged, including tax and exchange controls.

#### *Accounting standards and records*

- All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformance with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed.
- All Company reporting must be accurate and complete and comply in all material respects with accepted accounting policies and procedures. Employees must not materially misstate or knowingly misrepresent management information for personal gain or for any other reason.

#### *External reporting*

- Company may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Company Directors must be made aware of any sensitive disclosure before it is made.
- Care must be taken when making statements to the media to ensure that information given is correct and not misleading. Enquiries from the media must be referred to company media relations experts and statements may only be made by designated spokespersons.
- Company will provide, through its website and through any published annual report and accounts and other statements, appropriate information to enable shareholders to assess Company's business performance. Company will comply with applicable laws and regulations as to the disclosure of information about the organisation.

#### *Policies and procedures*

Company recognises that there are risks associated with carrying out any business activity. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

#### *Our commitments to our employees*

Company is committed to optimising individual and business performance by employing the best people at all levels and creating an environment in which they want to and are able to contribute fully to the Group's success. To achieve a working environment in which team spirit and commitment to the goals and values of Company are maintained, the Company will ensure that individual employees are treated fairly and with dignity and respect.

#### *Legal requirements*

In dealing with our employees, we will act in compliance with all legal requirements and employers' obligations to employees. Relevant labour laws and regulations will be respected and complied with.

#### *Fundamental Principles and Rights at Work*

In accordance with legislation and practice we will respect freedom of association, employment will be freely chosen with no use of forced or child labour, and we will not unlawfully or unfairly discriminate on any basis, including the basis of gender, race, ethnicity, culture, religion, sexual orientation, age or disability.

#### *Harassment*

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is

unacceptable. Should an employee believe that he or she has been harassed the matter should be raised with their line manager, departmental director, or with HR, who will arrange for it to be investigated without delay, impartially and confidentially.

#### *Equal opportunity*

We value all our employees for their contribution to our business. Employees' opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further within the company.

#### *Health and safety*

Company places the highest priority on promoting the health and safety of employees whilst at work. In particular, we will constantly review the effectiveness of our methods of operation to best protect our employees.

#### *Terms of employment*

Company will work towards creating permanent long-term relationships. Company will strive to ensure that employees are paid for and work hours at least as favourable as the terms established by national legislation, agreements or industry standards.

#### *Pre-employment screening and selection*

In order to protect the interests of our employees and customers, and because of the nature of our business, Company will apply rigorous pre-employment screening and selection techniques.

#### *Our employees' commitments to Company*

Employees must avoid situations where appearance of business impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct or where specific laws or regulations do not apply.

#### *Confidential information*

- Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment. "Confidential information" is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances. The employee's duty of confidentiality perpetuates even after the employee's employment with Company has been terminated, regardless of the reason for the termination.
- The term "confidential information" does not include information that is already freely and easily available in the public domain.

#### *Conflicts of interest*

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships that conflict with the interests of the Company, or that divide his or her loyalty to the Company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to Company, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of the organisation.

#### *Staff complaints, whistleblowing and suggestions*

- Company will give due consideration to constructive suggestions submitted by employees and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies and procedures.

- Concerns must be investigated impartially so that the employee’s rights are protected. Employees who have concerns about potential unethical behaviour should advise Company. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless they are legally required to do so.

*Compliance monitoring*

We monitor, on a regular basis, compliance with this ethics policy, using information reported via the whistleblowing facility, internal/external audit and ongoing management reporting.

*Adherence to policy*

Since Company aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with Company’s principles and policies will not be tolerated. Strict adherence to these principles and supporting policies is a condition of employment. Any action by an employee that deliberately or recklessly breaches this ethics policy may result in disciplinary action, and where appropriate, criminal proceedings may be instituted.

*Implementation*

This Business Ethics Policy will be made available on our network and will be monitored as part of Company compliance processes. The policy will be reviewed from time to time.

Business Ethics	
Approvals	Shane Strydom
{name}	
{name}	
{name}	
Next review date	15-03-2027

Initial  
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