

## **1. Background**

The Company has earned respect locally and internationally as a result of commitment, quality of work and excellent client service. Our success has been hard-earned, and our future depends on how we tackle the new challenges presented to us.

## **2. Purpose**

The primary focus of the Code of Ethics is to promote exemplary conduct. Notwithstanding this, an employee shall be guilty of misconduct, and may be dealt with in accordance with the collective agreement and / or disciplinary code and procedure if he /she contravenes any provision of the Code of Ethics or fails to comply with any provision thereof.

This code is intended to raise ethical awareness and as a guide to day-to-day decisions. It contains guidelines for everyday events that occur in the organisation.

The code should also act as a guideline to employees as to what is expected of them from an ethical point of view, both in their individual conduct and in their relationship with others. Compliance to the Code can be expected to enhance professionalism in dealing with clients, suppliers, fellow employees and management.

## **3. The Code of Ethics - General**

- 3.1. Employees shall conduct business in accordance with accepted principles of honesty and shall speak truthfully in all business practices to pursue their client's legitimate objectives.
- 3.1. Employees shall endeavour to understand and fairly represent their own scope of knowledge and ability in performing services.
- 3.2. Employees will display integrity and fair dealing with clients, competitors and vendors to foster healthy competition and the creation of value.
- 3.3. Employees will be accountable and responsible for business dealings by using all reasonable effort to resolve any disputes or impropriety with members, suppliers, clients or any other party.
- 3.5 Confidentiality – No information will be revealed to any outside party by any employee with regard to Company projects, particularly in respect of client information. The Company is privy to sensitive information that could harm its clients and the Company if the information is divulged to a third party.
- 3.6. Any employee who signs legal binding documents or any document on behalf of the Company without the proper authority will face disciplinary steps. All legal binding documents will only be signed by (a) the MD, (b) the acting MD, or (c) with the express written permission of the MD.

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- 3.7. Under no circumstances can any employee enter into negotiations with clients without the consent of the Managing Director.
- 3.8. Under no circumstances will any copyright material be used illegally. Any picture, video clip, text and other electronic form of data, downloaded from the Internet or received via the network should be regarded as copyright unless it specifically states the opposite. Failure to adhere to this will result in disciplinary action
- 3.9. Security – No employee will reveal usernames, passwords or IP addresses of systems or employees to any outside party or act in an irresponsible way when dealing with confidential information.
- 3.10. Source code of applications, scripts and any other information developed by the Company that could assist hackers/crackers must be shredded, once it is no longer in use.
- 3.11. Gaining access to electronic information through hacking/cracking or any other means by employees will be deemed as misconduct and the company will initiate the appropriate investigation and disciplinary action, which may include dismissal or expulsion, as the case may be.
- 3.12. No pornographic material (electronic or other) will be allowed into The Company offices.
- 3.13. No racist remarks/comments or any other form of discrimination will be tolerated. Victims of such offences should bring the matter to the attention of the HR Manager.
- 3.14. If an employee has a grievance, he/she should contact his/her manager/team leader. If the grievance or problem cannot be resolved at that level, he/she may proceed with the grievance to the HR Manager. If there is still no resolution, the HR Manager will escalate the matter to executive level.
- 3.15. Vulgar language, jokes or innuendos directed toward an individual or group based on physical characteristics, stereotypes or cultural biases are unacceptable in the workplace.
- 3.16. Avoid comments, body language or distracting activity that conveys a message of disrespect towards management and / or fellow employees.
- 3.17. Any form of distraction which will affect work performance is strongly discouraged including share monitoring, music, private Internet surfing or any other form of entertainment. Any employee indulging in these activities at the expense of the Company will face disciplinary action.
- 3.18. The Companies dress code is smart casual. Meetings with senior management of other companies, or our clients, will require the appropriate dress code.
- 3.19. Overt rivalry between competitors, clients or fellow employees is strongly discouraged. We expect professional behaviour from employees at all times.

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- 3.20. The Companies clients must be treated respectfully and professionally, and when occupying client offices, employees must adhere to client policies and procedures.
- 3.21. Any derogatory remarks/opinions expressed against decisions made, or stances held, by The Company shareholders, the MD or directors of the company, or fellow employees will be regarded as highly unprofessional and damaging to the future of the Company and its employees. This type of behaviour cannot be tolerated as it has an impact on everyone. Failure to adhere to this will result in disciplinary action.
- 3.20. The use of the Companies equipment for private use is prohibited unless written permission has been obtained from management.
- 3.21. Pirating of software is strictly prohibited.
- 3.22. No employee is allowed to express an opinion on the Companies policy, strategy, or products to the press, bulletin boards or any other form of electronic media under the name of the Company without written permission from management.
- 3.23. Working hours are stipulated in each employee's service contract and should be adhered to, unless otherwise arranged with the relevant manager. Working hours are monitored and security access records will be analysed, if necessary.
- 3.24. All employees must sign leave forms before going on leave or after a period of sick leave (even one day). A doctor's certificate must be attached, for sick leave for a period of three or more working days. The relevant manager must approve the leave form before it is handed in to the HR department.
- 3.25. No employee may take more than 6 days' leave in arrears. Any leave which is more than 6 days in arrears will be regarded as unpaid leave, unless cleared by a director before the employee goes on leave.
- 3.26. All non-technical positions to be filled with PDIs. Any digression to this must be approved by the MD, with the necessary motivation, prior to making an offer to a candidate. Every effort must also be made to fill technical positions with PDIs.

#### **4. Application of the Code**

The Code of Ethics is applicable to:

1. Board Members, Executive Managers, General Managers, Senior Managers, and Managers / Team Leaders,
2. All employees of the Company
3. Clients, Consultants, Contractors, etc.

#### **5. General Obligations**

All people to whom this Code of Ethics applies shall fulfil their obligations in such a manner that they conduct business by ethical, fair and commercial competitive practices.

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IN ADDITION ALL EMPLOYEES NEED TO ABIDE BY THE CODE OF ETHICS POLICY OF THE ALTRON GROUP.

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## **6. General Management Obligations**

6.1. The managers shall, by reason of their position of running the business:

- 6.1.1. Be responsible to communicate this Code and to ensure its understanding by all the employees
- 6.1.2. Be responsible for the observance of the ethical obligations
- 6.1.3. Take the necessary steps for compliance within the company with the provision of this Code of Ethics

6.2. For the purpose of this policy, a Manager includes all management from MD to manager/team leader and all Board members with due regard to the extent to which they are engaged in the affairs of the Company.

## **7. Manager Obligations to Clients**

7.1. A Manager shall:

- 7.1.1. Market the products and services accurately;
- 7.1.2. Disclose all relevant information regarding the products and services which clients cannot reasonably learn;
- 7.1.3. Charge the agreed price or, where no prices were agreed, a fair price; and
- 7.1.4. Supply the products and services with a promptness that at least meets the reasonable expectation of the Client and, where supply will be delayed, inform the Client of this in good time.

7.2. A Manager has a responsibility to the clients to fix and maintain quality standards, and in particular shall:

- 7.2.1. Determine the minimum quality standard for the products and services and ensure that the products and services conform to these standards.
- 7.2.2. Make known any standard of quality which is higher than the customary standard, and any price premium that is justified by such higher standard; and
- 7.2.3. Provide Clients with a ready means of lodging complaints about the quality of products and services.

7.3. A Manager shall manage the company with the view to achieving the greatest possible savings and benefits for employees and in turn clients, and in particular shall:

- 7.3.1. Strive to reduce inefficiencies, and establish, if applicable, efficiency in the organisation by consultation with the employees;
- 7.3.2. Introduce and maintain an awareness by all employees that the resources of the company, including time resources, are in limited supply;
- 7.3.3. Keep all costs at the lowest reasonable level;
- 7.3.4. Not abuse a position of market dominance or engage in restrictive trade practices, and
- 7.3.4. Not permit any acts of bribery.

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7.4. A Manager shall respect the confidentiality of sensitive client information.

## **8. Obligations of Managers towards Suppliers**

8.1. A Manager shall:

8.1.1. Ensure good procurement practices with Suppliers, and in particular he / she shall:

8.1.1.1. Inform a Supplier of any bribe or attempted bribe by the Supplier's personnel of an employee;

8.1.1.2. Terminate dealings with any Supplier which bribes employees

8.1.1.3. Ensure that no bribe is paid to personnel of a Supplier.

8.1.2. Ensure compliance with its debt obligations to Suppliers of credit, including lenders of money, and in particular a Manager shall:

8.1.2.1. Not apply funds acquired from a lender for a purpose which is contrary to any agreement with the lender;

8.1.2.2. Not manage in a way which increases the risks to its debtors;

8.1.2.3. Report honestly on the financial position to its creditors;

8.1.2.4. Have regard for the interests of its creditors when requesting an extension of time in which to pay, and

8.1.2.5. Inform the creditor concerned of any inability to meet any such obligations.

## **9. Obligations of Managers towards Employees**

9.1. A Manager shall:

9.1.1. Deal courteously with Employees, having regard to cultural sensitivities and individual dignity;

9.1.2. Give due attention to the training and personal development of Employees;

9.1.3. Provide safe working conditions;

9.1.4. Not discriminate on any ground which do not affect the carrying out of the duties of the Employee;

9.1.5. Provide opportunities for individuals whose potential has been restricted by unethical legislation or social discrimination in the past;

9.1.6. Recognise Employee's efforts by fair and adequate remuneration and other means;

9.1.7. Protect Employees against physical, mental or emotional harassment;

9.1.8. Comply with the laws governing labour relations and conditions of employment;

9.1.9. Make this Code of Ethics and reasons for it known to Employees, and

9.1.10. Manage in such a way as not to unreasonable jeopardize the job security of Employees.

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## **10. Obligations of Managers towards Competitors**

10.1. A Manager shall not:

- 10.1.1. Make dishonest allegations concerning Competitors or concerning their products and services;
- 10.1.2. Damage the business of Competitors other than by accepted commercial competitive practice;
- 10.1.3. Acquire confidential information about a Competitor by espionage, compromise or corruption of the Competitor's employees or any other improper means.

## **11. Obligations of Managers towards Society at Large**

11.1. Managers shall, in the carrying out of the business:

- 11.1.1. Pay due regard to environmental and public health considerations;
- 11.1.2. Not retrench employees without taking due consideration of the well-being of society at large;
- 11.1.3. Participate, within the means of the company, in projects, which will foster the upliftment of communities in which the company operates.

## **12. Obligation of Employees other than Managers to Customers**

12.1. An Employee , other than a Manager, shall:

- 12.1.1. Support and assist Management to fulfilling its strategic, commercial and ethical obligations as set out in this Code;
- 12.1.2. Avoid wastage of any of the resources of Clients, including time;
- 12.1.3. Respect the confidentiality of sensitive Client information;
- 12.1.4. Help fellow employees in meeting their obligations, and
- 12.1.5. Deal courteously, politely and professionally with all clients, having regard to cultural sensitivities ad individual dignity.

## **13. Obligation of Employees towards Managers**

13.1. An Employee shall perform their duties diligently and efficiently, and in particular, shall:

- 13.1.1. Support and assist Management to fulfil its commercial and ethical obligations as set out in this Code;
- 13.1.2. Avoid any wastage of resources, including time;
- 13.1.3. Refuse any bribe and report attempted bribery to a Manager;
- 13.1.4. Report any harmful activity observed at the workplace to their immediate supervisor;
- 13.1.5. Join Management in a commitment to improve productivity, and
- 13.1.6. Deal courteously, politely and professionally with all management, having regard to cultural sensitivities and individual dignity.

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#### **14. Obligations of Employees to fellow Employees**

14.1. An employee shall:

- 14.1.1. Not make false accusations against a fellow employee;
- 14.1.2. Not intimidate or harass a fellow employee;
- 14.1.3. Recognise fellow employee's rights to freedom of association; and
- 14.1.4. Deal courteously, politely and professionally with fellow employees, having regard for cultural sensitivities and individual dignity.

#### **15. Obligations of Employees towards the Society at large**

15.1. An employee shall:

- 15.1.1. Pay due regard to environmental and public health considerations in and around the workplace;
- 15.1.2. In the course of his/her official duties, report to the appropriate authorities, fraud, corruption, nepotism, maladministration and any other acts which constitute an offence, or which are prejudicial to the public interest;
- 15.1.3. Refrain from favouring relatives and friends in work-related activities and never abuse his/her authority over another employee, nor be influenced to abuse his/her authority,
- 15.1.4. Be committed to optimal development, motivation and utilisation of company resources and the promotion of sound labour and interpersonal relations;
- 15.1.5. Deal fairly, professionally and equitable with other employees, irrespective of race, gender, ethnic or social origin, colour, sexual orientation, age, disability, religion, political persuasion, conscience, belief, culture or language;
- 15.1.6. Honour the confidentiality of matters, documents, discussions, classified or implied as being confidential or secret;
- 15.1.7. Not use or disclose any official information for personal gain or the gain of others.

#### **16. Obligations of Suppliers and Lenders towards the Company**

16.1 A Supplier of any product or service shall strive to provide products and services of good quality which comply with agreed standards at a competitive price within the agreed delivery period, in relation to the obligations to its client.

16.2. A Supplier on credit, including a lender of money, shall not:

- 16.2.1. Charge interest unless the rates and conditions are agreed in writing with the company, unless it is a standard condition of a company to charge interest for extended credit;
- 16.2.2. Abuse a position of market dominance to engage in a restrictive trade practice.

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**17. Obligations of Suppliers and Lenders towards Management**

17.1. A Supplier on credit, including a lender of money, shall not:

17.1.1. Withdraw credit facilities from the enterprise unjustifiably.

17.1.2. Take advantage of a dominant market position to enforce unfair conditions or obligations upon the Company through the threat of withdrawal of credit facilities.

**18. Conflict of interest**

18.1. Each Manager / employee must declare any personal or private financial of business interests in any company with business relations to the Company or its Subsidiaries, Suppliers or Competitors.

I have read and understand the contents of this policy.

Name: .....

Signature: .....

Date: .....

Please initial every page as well as any writing made in ink.

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