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## MACROCOMM GROUP HR BUSINESS INTEGRITY POLICY

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## DOCUMENT CONTROL

This provides information on the document version control and sign-off

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CHANGES MADE		
<p>Aligned to ISO template</p> <p>Removed process map</p> <p>Refined key stakeholders in process</p> <p>Updated name from MC to MG for Macrocomm Group</p>		
STAKEHOLDER NAME AND DESIGNATION	SIGNATURE	DATE
Sivi Moodley (Macrocomm Group Chief Executive Officer)		
Elton Chettiar (Macrocomm Group Chief Operating Officer)		
Yakshini Naidoo (Managing Executive: Corporate Services and Compliance)		
Charlene Van Onselen (Business Optimisation Executive)		

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# BUSINESS INTEGRITY POLICY

## 1 Purpose

Macrocomm expects their employees to act with honesty, integrity and fairness in all spheres of their work and interactions when doing business. Everything we do must be judged on whether it would appear ethical and fair to our colleagues, to ourselves and to the public.

Macrocomm and its staff commit to uphold and assist others in upholding the dignity, standards, and reputation. Our staff are expected to take all reasonable steps to ensure that all steps taken are done so within the principals of sustainable development and environmental responsibility.

Macrocomm and its staff further commit to serving our clients and society in a manner which is free of corruption, and to act in the best interests of our clients always, notwithstanding that we treat all our stakeholders and each other in a fair manner with integrity, good faith, efficiency, competence and in a non-discriminatory manner.

All staff members MUST complete Business Integrity Policy training as part of their induction.

## 2 Policy Principles

Macrocomm and its staff have adopted the following principles in this policy:

- Macrocomm, its staff and members will neither initiate nor commit corrupt practices in any manner or form whatsoever.
- No Members or staff shall accept or give a bribe whether directly or indirectly, and such bribery is constituted as unethical behaviour.
- Any gifts or rewards above R500 need to be declared to the relevant legal representative for review.
- Acceptance of payment or remuneration not to allow for impartial judgement is considered as unethical practice.
- Employees must disclose any interest in any other business, undertaking, institution or participation in any other activity that may result in a conflict or potential conflict of interest with Macrocomm.
- All staff are responsible for familiarising themselves with local laws and client policies regarding corruption and should report any criminal behaviour to the relevant authorities.
- Confidentiality is of the highest importance and all staff are to work professionally, in good faith and have a duty to protect confidential information

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and may not use any information about our clients such as financial results, mergers or acquisitions, contract or awards, to third parties or for personal gain.

- No employee is permitted under any circumstances to falsify documents or commit any similar act that may jeopardise the record keeping of Macrocomm or of client information.

### 3 Failure to Adhere to the principles of this policy.

- Failure by any employee of Macrocomm to abide by the principles set out in this policy will result in a disciplinary action being taken against them.
- Macrocomm regards the integrity of its business operations to be of the utmost importance. As such, Macrocomm encourages all Employees, who have good reason to believe that Macrocomm or any of its Employees is/are engaging in Improper Conduct, to disclose this Improper Conduct under this Policy.
- Employees are encouraged to use the [integrity@macrocomm.com](mailto:integrity@macrocomm.com) email address to disclose any Improper Conduct.
- Macrocomm undertakes to investigate any reported irregularity and to treat such an investigation with the **fullest confidentiality** and employees making such reports will not be subject to threats, harassment, retaliation, and their identity will be held in confidence to the full extent permitted by law.

**Commented [CV1]:** Do we still have this email address? Do we need it? Should it go a specific shared email address? E.g. [HR@macrocomm.co.za](mailto:HR@macrocomm.co.za)

*Copies of this policy shall be made available to all employees and displayed at all main locations.  
It shall be brought to the attention of all employees, contractors, and visitors and be made available to any other interested party.*