

Policies and Procedures – Human Resources																	
	<table border="1"> <tr> <td>Policy Name</td> <td>Code of Conduct</td> </tr> <tr> <td>Policy Number</td> <td>HR-POL-046/01</td> </tr> <tr> <td>Owner</td> <td>Group HR Executive</td> </tr> <tr> <td>Version</td> <td>0</td> </tr> <tr> <td>Original Date of Issue</td> <td>08 June 2017</td> </tr> <tr> <td>Revision Date</td> <td></td> </tr> <tr> <td>Revised By</td> <td></td> </tr> <tr> <td>Approved By</td> <td>CEO</td> </tr> </table>	Policy Name	Code of Conduct	Policy Number	HR-POL-046/01	Owner	Group HR Executive	Version	0	Original Date of Issue	08 June 2017	Revision Date		Revised By		Approved By	CEO
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OBJECTIVE

Our Code of Conduct outlines our expectations regarding employees' behaviour towards their colleagues, supervisors, clients and overall organisation. We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organised, respectful and collaborative environment.

SCOPE

This policy applies to all our employees regardless of employment agreement or rank. Please read our code carefully. Knowing and understanding these principles will help you determine how to behave and what to do in the workplace. As well as helping each of us to be a successful co-worker, this code helps us all to 'do the right thing when no one is looking'.

WHY DO WE HAVE A CODE OF CONDUCT?

The purpose of this code of conduct is to help you understand what is expected from you as a member of GVK-Siya Zama. It is a set of legal, ethical and moral guidelines that describe the behaviour we expect of each of us and the minimum standards against which we hold ourselves accountable. By clarifying these expectations and standards we hope to help you succeed and prosper within GVK-Siya Zama and, by extension, GVK-Siya Zama to succeed and prosper within the communities in which it operates.

The GVK-Siya Zama Code of Conduct outlines expected behaviours for all employees. GVK-Siya Zama will conduct its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable laws and regulations. In conducting its business, integrity must underline all Company relationships, including those with customers, suppliers, communities and among employees. The highest standards of ethical business conduct are required of GVK-Siya Zama employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the Company's honesty, impartiality, or reputation or otherwise cause embarrassment to the company.

COMPLIANCE WITH LAWS

Every employee at GVK-Siya Zama must comply with all applicable laws and regulations in his or her environment, as well as internal instructions and business policies. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

BRIBERY AND CORRUPTION

We do not tolerate any illegal favourable treatment in the form of bribery or similar activities. We accept business courtesies only to the extent that they are in line with standard business practices – and even then, only if they do not have any influence on the business decision. Bribes and cartel

agreements are not a means for us to obtain a contract. We would rather forgo a contract and the achievement of internal goals than act against the law. Infringements are not tolerated and result in sanctions against the persons concerned. All directors, all executives and all other employees must be aware of the exceptional risks which a corruption or anti-trust case can mean for the Company, as well as for them personally. Every employee is urged to actively participate in complying with these regulations in his or her area of responsibility.

ACTING RESPONSIBLY

For us, responsible action is not based exclusively on laws and regulations, but also on the conscientiousness of the individual and the standards that are defined in these guidelines.

- **Avoidance of Conflicts of Interest**

At GVK-Siya Zama, business decisions are taken exclusively in the best interests of the Company. Conflicts of interest involving private matters or various economic or other activities, also involving family members or other closely associated individuals or organisations, should be avoided from the outset. If they nevertheless occur, they should be resolved in accordance with law and order and the applicable corporate guidelines. The prerequisite for this is the transparent disclosure of the conflict.

- **Customer Relationships**

We take care of our customers over the long term. We secure their loyalty by earning their confidence in us. We attempt to anticipate what our customers need – before they ask for it. We do everything possible to offer our customers the best service. We treat everyone fairly and with the same degree of respect and courtesy, regardless of the volume of business.

- **Correct Market Conduct**

We outmatch our competitors through superior performance, not through the use of unfair or dishonest practices. We do not distort or conceal the facts or truth. Nor do we use any information to which we are not entitled to gain an unfair advantage over our competitors. We act fairly, honestly and in good faith towards everyone with whom we are involved: customers, business partners, competitors, suppliers, the public and colleagues.

- **Respect in the workplace**

All employees should respect their colleagues. We won't allow any kind of discriminatory behaviour, harassment or victimisation. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

- **Protection of Company Property**

All employees should treat our Company's property, whether material or intangible, with respect and care. Employees:

- Shouldn't misuse Company equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
- Employees should protect company facilities and other material property (e.g. Company cars) from damage and vandalism, whenever possible.

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our Company offers.

DISCIPLINARY ACTIONS

All employees are expected to be familiar with their role and duties and GVK-Siya Zama's internal policies and procedures, as failure to comply with them may be considered to be misconduct and employees may be subject to disciplinary action that could lead to dismissal.

Furthermore, note that the Code of Conduct is not intended to comprise an exhaustive list of what constitutes ethical conduct, nor is it intended to contain a comprehensive list of offences or contraventions on which GVK-Siya Zama will take appropriate legal action.

GVK-Siya Zama respects the right of an individual to retain their anonymity when reporting non-compliance with this Code of Conduct. Individuals must make use of the anonymous reporting hotline should they wish to retain their anonymity. In this regard, employees are specifically referred to the Company's Whistle Blowing Policy.