



**FIRST TECHNOLOGY INVESTMENTS (PTY) LTD AND ALL OF  
ITS AFFILIATES**

**CODE OF CONDUCT FOR BUSINESS PARTNERS**

Legal Division

Revision 1

Effective Date: March 2019

This document (including but not limited to manuals, policies, procedures, forms referenced or included herein) applies to all Affiliated Companies of First Technology Investments (Pty) Ltd.

**“Affiliated Company(ies)”** means, in relation to First Technology Investments (Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries. Including but not limited to:

- First Technology National (Pty) Ltd
- First Technology Western Cape (Pty) Ltd
- First Technology KwaZulu Natal (Pty) Ltd
- First Technology (Central) (Pty) Ltd
- FirstNet Technology Services (Pty) Ltd
- First Technology (Pty) Ltd
- First Technology Digital (Pty) Ltd
- First Technology MPS (Pty) Ltd
- First Technology (Audio) (Pty) Ltd
- First Technology Secure (Pty) Ltd
- First Technology IT Suppliers (Pty) Ltd
- Marketplace Solutions (Pty) Ltd
- Galdon Data Computer Services (Pty) Ltd
- Phoenix Distribution (Pty) Ltd
- BUI Medical and Technology Suppliers (Pty) Ltd
- EVAR Technology (Pty) Ltd
- Galdon Data Solutions (Pty) Ltd
- The CRM Team (Pty) Ltd
- Comptronics (Pty) Ltd
- First Retail (Pty) Ltd

This list is subject to amendment at the sole discretion of the First Technology Investments (Pty) Ltd and will include all affiliates whether listed or not.

Revision History

<b>VERSION NUMBER</b>	<b>REVISION DATE</b>	<b>EFFECTIVE DATE</b>	<b>COMPILED BY</b>	<b>APPROVED BY HEAD OF GROUP LEGAL</b>	<b>DESCRIPTION OF CHANGE</b>
01	03/2019	03/2019	Grace Uchena	Richard Hammond	First version

**Quality Records Table- Retention Table**

**Department:** Legal Department

<b>IDENTIFICATION</b>	<b>STORAGE</b>	<b>PROTECTION</b>	<b>RETENTION TIME</b>	<b>VERSION IN PROCESS</b>	<b>DISPOSITION</b>
Employee Code of Conduct for External Business Partners	Electronic	Back-up	N/A		N/A

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We at First Technology Investments (Pty) Ltd.'s (Registration number: 1998/019350/07) including all its Affiliates' ("Affiliate" means, in relation to First Technology Investments (Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries) (hereinafter collectively referred to as "the First Technology Group") has a no tolerance approach to bribery and other forms of corruption, and is committed to acting professionally, fairly, and with integrity, in compliance with the standards of conduct set forth in all applicable anti-bribery and corruption laws of the countries in which we operate as well as international anti-bribery and corruption laws.

First Technology Group expects and requires all Business Partners to act professionally and ethically at all times in carrying out services and contractual obligations to the First Technology Group or on behalf of the First Technology Group.

#### **DECLARATION BY BUSINESS PARTNERS**

By doing business with the First Technology Group, you declare that:

- There are no actual or potential conflicts of interest between any of your company's directors, senior executives, managers, or employees and the work to be completed or services to be provided under your business relationship with the Group;
- No director, senior executive, manager or employee of your company has been convicted of a criminal offence involving bribery, corruption or fraud in the last 10 years or has been involved in any litigation of this nature or has any legal proceedings of this nature pending.

#### **IMPROPER PAYMENTS**

Business Partners shall not, directly or indirectly, promise, authorize, offer or pay Anything of Value (including but not limited to gifts, travel, hospitality, charitable donations or employment) to any Government Official or other party to improperly influence any act or decision of such official for the purpose of assisting the First Technology Group in obtaining or retaining business or improperly promoting the business interests of the Group in any respect. "Anything of Value" and "Government Official" is fully defined in the Anti-bribery and Corruption Policy.

### **GIFTS AND ENTERTAINMENT**

Business Partners will not promise, offer, give, authorise, request or agree to give or receive Anything of Value to or from any Government Official or non-government official, in your own interests or on behalf of the First Technology Group.

### **ACCURATE BOOKS AND RECORDS**

Business Partners must keep and maintain books, records and accounts that accurately and fairly reflect all transactions that you conduct with or on behalf of the First Technology Group. No undisclosed or unrecorded accounts may be established for any purpose. False, misleading, incomplete, inaccurate or artificial entries in the books and records are prohibited. Personal funds may not be used to accomplish what is otherwise prohibited by this Policy or any other policies of the First Technology Group.

### **AFFILIATION WITH GOVERNMENT OFFICIALS OR WITH EPSIDON**

If a Business Partner or an officer, director, employee or agent of our Business Partner is a Government Official, you are required to immediately disclose the affiliation to First Technology Group in writing prior to engaging in any business with the Group. If a Business Partner's family member, or a family member of a director, employee or agent of a Business Partner is related to a current First Technology Group employee or an agent acting on behalf of the First Technology Group, you are required to immediately disclose this relationship to the First Technology Group in writing prior to engaging in any business with the First Technology Group.

### **MONEY LAUNDERING**

Business Partners shall not use its relationship with the First Technology Group to disguise or attempt to disguise any source of illegally obtained funds.

### **REPORTING**

Business Partners must report any concerns about violation of this Policy or applicable laws to their legal department and/or their ethics and compliance officer. Business Partners must also report any unethical or illegal practices to the First Technology Group by email to the general email address of the Group's legal department at [legal@firsttech.co.za](mailto:legal@firsttech.co.za) .

### **ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR**

Business partners must not have any forced or involuntary labour. It is not tolerated in any form. This includes any work or service performed by a person under the threat of penalty and for which the person has not offered himself or herself voluntarily. It also prohibits business partners from requiring employees to deposit money or original documents such as passports, education certificates and the like, during their employment.

### **SUPPORT AND RESPECT OF HUMAN RIGHTS**

Business partners have to support and respect the protection of human rights. They have to be able to confirm that they are not complicit in human rights abuses and they must comply with the main international ethical guidelines supported by the First Technology Group.

### **ELIMINATION OF DISCRIMINATION WITH RESPECT TO EMPLOYMENT AND OCCUPATION**

Business partners must support equal opportunities, fairness and diversity and ensure that all employees are treated strictly according to their abilities and qualifications in any employment decisions, regardless of ethnic group, religion, gender, age, nationality, disability, personal relationship, union membership and/or political opinion.

### **SAFE AND HEALTHY WORKING ENVIRONMENT**

By doing business with the First Technology Group, you are required to make employees' safety a priority at all times. Work premises have to be such that workers can perform their functions in a safe and healthy environment, including fire prevention. To minimize risks, there must be appropriate policies to safeguard employee health and safety, training and clear role descriptions. Facilities for employees must safeguard individuals' dignity and meet personal hygiene needs. You shall must take appropriate action to ensure safety and prevent accidents and illnesses resulting from workplace conditions, on behalf of their employees. This includes availability of first aid equipment, for example.