



Change Intervention Programme

Matjhabeng Change Intervention Programme NPC

CIPC 2022/505649/08

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POLICY & PROCEDURE

CODE OF CONDUCT POLICY

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Table 1 - Revision History

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CODE OF CONDUCT POLICY

1. INTRODUCTION

- 1.1. In accordance with the [Companies Act 71 of 2008](#) ("the **Act**"), with registration number 2022/505649/08, and the Memorandum of Incorporation ("**MoI**") of Matjhabeng Change Intervention Programme ("**FS184-CIP**"), the Board of FS184-CIP is responsible for the governance of FS184-CIP.
- 1.2. These responsibilities entail, inter alia, that FS184-CIP should on a continuous basis account for and report on all assets, liabilities, income, expenditure, and other financial transactions. This also applies to any entity/body that function under the auspices of FS184-CIP.
- 1.3. In accordance with the King IV (or later) Report on Governance for South Africa 2016, the Board, Executive and management of FS184-CIP, must be aligned with the value system of FS184-CIP. It also requires that FS184-CIP take active measures to ensure that all Members and officials adhere to the Code of Conduct in all aspects of its business and in particular to apply the principles of best practice throughout FS184-CIP.
- 1.4. In this regard the Board is guided by the FS184-CIP vision, mission and value systems which require the Board, the Executive, management, and Members to act in an ethical, consistent, responsible, and transparent manner.
- 1.5. The Code of Conduct must be approved by the Executive, or a Committee of the Executive as delegated by the Executive.
- 1.6. To give effect to the above, the Board, the Executive, management, and Members must endorse and comply with the Code of Conduct (refer paragraph 22 - PERSONAL DECLARATION & ENDORSEMENT on page 18).

2. DEFINITIONS

- 2.1. Where the following words or phrases are used in this Code of Conduct Policy, such words or phrases shall have the meaning assigned thereto in this clause, except where the context clearly requires otherwise:
 - 2.1.1. "**Board**" means the Board of Directors of the FS184-CIP.
 - 2.1.2. "**Code**" means the/this Code of Conduct Policy.
 - 2.1.3. "**Registered Member/s**" means any person that have registered on the FS184-CIP website as a [FS184 CIP Member](https://fs184.cip21.online/register/) (<https://fs184.cip21.online/register/>) and having paid the annual Membership fee.



- 2.1.4. **“Corporate Member/s”** means a person appointed by the FS184-CIP Executive Committee as a permanent or temporary person of good standing to serve in a specific role (or roles) in the day-to-day operation of FS184-CIP. Notwithstanding the generality of the meaning of the term, where the context prevails this term may also include Members of the Board, executive officers, and management.
- 2.1.5. **“Executive or executive officers”** means the Executive Committee (**“EXCO”**) of FS184-CIP.
- 2.1.6. **“King Report”** means the [King IV Report on Corporate Governance for South Africa](#) as issued in 2016, (or any relevant and legally enforceable subsequent report on governance applicable to FS184-CIP).
- 2.1.7. **“Lifestyle Audit/s”** means a comparative exercise in which a person’s legitimate income is measured against their lifestyle, as contemplated in paragraph 15 - LIFESTYLE AUDITS.
- 2.1.8. **“Line manager or management”** means the Management Committee (MANCO) of FS184-CIP.
- 2.1.9. **“Member/s”** means Registered Members and Corporate Members respectively and collectively, as the context implies.
- 2.1.10. **“FS184-CIP”** means the GT421 CIP NPC trading as the Matjhabeng Stakeholder Forum.
- 2.1.11. **“Premises”** means any office or venue where FS184-CIP conducts its business from, either on a permanent or temporary basis.
- 2.1.12. **“Relative”** means spouse, life partner, parent, parent-in-law, child, stepchild, adopted child, or adopted child within the first degree of consanguinity, spouse of child, brother, sister, brother-in-law, sister-in-law, grandchild and/or anybody related to that person or his or her spouse, within the third degree of consanguinity or affinity.
- 2.1.13. **“Representatives”** means agents representing FS184-CIP.
- 2.1.14. **“Spouse”** means a person’s partner in a marriage.
- 2.1.14.1. recognised as such in terms of the laws of the Republic of South Africa or a foreign country; or
- 2.1.14.2. conducted in terms of Islamic or other religious rites.
- 2.1.15. **“Supplier”** means any entity or individual selling goods or delivering services to FS184-CIP, including but not limited to, suppliers who are registered on the supplier database of FS184-CIP.



- 2.1.16. **“Volunteers”** means non-remunerated individuals assisting FS184-CIP on a voluntary basis.
- 2.1.17. **“Whistle-blower”** means a Member or any other party who reports an activity that he/she/it considers to be illegal or dishonest to one or more of the parties, where full anonymity is maintained in terms of the Whistle-blowers identity, and as contemplated in sub-paragraphs 13.3 through 13.5 on page 12 below.
- 2.2. Clause headings are included for ease of reference only.
- 2.3. Any term, word, acronym, or phrase used, other than those defined under this section 2 - DEFINITIONS, shall be given its plain English meaning, and those terms, words, acronyms, and phrases used will be interpreted in accordance with the generally accepted meanings accorded thereto.
- 2.4. A reference to the singular incorporates a reference to the plural and vice versa.
- 2.5. A reference to natural persons incorporates a reference to legal persons and vice versa.
- 2.6. A reference to a particular gender incorporates a reference to the other gender.

3. PURPOSE

- 3.1. The purpose of this Code is to establish guidelines for the professional conduct and responsible behaviour of those acting on behalf of FS184-CIP, including Community- and Corporate Members, as well as Volunteers and Representatives.
- 3.2. The Code requires from Members to conduct themselves with dignity, honesty, integrity, and respect when interacting with colleagues, clients, or customers of FS184-CIP or the public.
- 3.3. The Code also requires from Members to respect the environment and to assist FS184-CIP to be a responsible corporate citizen.

4. PRINCIPLES

- 4.1. Members are required to assist with the realisation of the FS184-CIP Vision and Mission in a manner that complies with the FS184-CIP core values.
- 4.2. The Code provides a framework and is thus not designed to provide ready-made answers for every possible factual situation that may be encountered in the workplace. Should a Corporate Member have any doubt about the legitimacy of a proposed way of dealing with a specific situation, he or she should consult his or her line manager.



5. VALUE STATEMENT

- 5.1. Ethics represent the cornerstone of corporate governance while a value system is the expression of the ethical foundation of an organisation.
- 5.2. All deliberations and decisions by Corporate Members be based on the following ethical (core) values:
- 5.2.1. **Responsibility:** assuming responsibility for the business, reputation, and assets of FS184-CIP and being willing to take corrective action where necessary to keep FS184-CIP on a successful, ethical, and sustainable path.
- [Oxford](#): a duty to deal with or take care of somebody/something, so that you may be blamed if something goes wrong
- 5.2.2. **Accountability:** the obligation to account for decisions and actions to stakeholders and role players.
- [Oxford](#): the fact of being responsible for your decisions or actions and expected to explain them when you are asked
- 5.2.3. **Transparency:** disclosing information in a manner that enables stakeholders to make informed decisions about FS184-CIP's performance and sustainability.
- [Oxford](#): the quality of something, such as a situation or an argument, that makes it easy to understand
- 5.2.4. **Fairness:** giving fair and appropriate consideration to the legitimate interests and expectations of all FS184-CIP stakeholders and role players, and to act accordingly.
- [Oxford](#): the quality of treating people equally or in a way that is reasonable
- 5.3. With regard to professional and ethical conduct by Members or 3rd parties acting on behalf of FS184-CIP, the following values should be practised:
- 5.3.1. **Proficiency:** by refraining from rendering or providing any professional service for which a Member is not qualified unless knowledgeable advice and/or assistance is obtained to enable him/her to perform satisfactorily.
- [Oxford](#): the ability to do something well because of training and practice
- 5.3.2. **Excellence:** by encouraging and supporting co-Members in the pursuit of professional excellence.
- [Oxford](#): the quality of being extremely good
- 5.3.3. **Equitable:** by treating others in a fair and impartial manner.



- Oxford: fair and reasonable; treating everyone in an equal way
- 5.3.4. **Respect**: by treating others with civility and dignity.
- Oxford: a strong feeling of approval of somebody/something because of their good qualities or achievements
- 5.3.5. **Diversity**: by recognising the contribution diversity makes to creativity and the enrichment of life.
- Oxford: a range of many people or things that are very different from each other
- 5.3.6. **Integrity**: by maintaining an unfailing commitment to honesty and to act accordingly, with strong moral principles always.
- Oxford: the quality of being honest and having strong moral principles
- 5.3.7. **Trustworthiness**: by always acting in a reliable and dependable manner.
- Oxford: the quality of always being good, honest, sincere, etc. so that people can rely on you
- 5.3.8. **Compliance**: by following laws, regulations, and FS184-CIP policies.
- Oxford: the practice of obeying rules or requests made by people in authority
- 5.3.9. **Stewardship**: by looking after FS184-CIP's property as well as its resources and the environment.
- Oxford: the act of taking care of or managing something, for example property, an organization, money, or valuable objects
- 5.3.10. **Confidentiality**: by protecting the integrity and security of FS184-CIP's information and treating third-party information as confidential where one is legally required to do so.
- Oxford: a situation in which you expect somebody to keep information secret

6. DILIGENCE

- 6.1. Members should always act in good faith. They are required to carry out their duties in a diligent, efficient, and conscientious manner. In this regard, Members should:
- 6.1.1. maintain and develop an in-depth knowledge and understanding of their area of expertise and/or the professional field within which they are active,



- 6.1.2. be present at work as required and only be absent from the workplace with proper authorisation,
- 6.1.3. carry out official decisions and policies faithfully and impartially using the information available to them,
- 6.1.4. endeavour to attain the highest possible standard of performance; and
- 6.1.5. comply with all lawful and reasonable instructions.

7. EQUITABLE AND RESPECTFUL TREATMENT

- 7.1. FS184-CIP endeavours to actively foster impartiality and create an environment where people are treated equitably and with respect, where an individual's rights are respected, where effort is encouraged and where achievements are recognised. In this regard Members should:
 - 7.1.1. be responsive, courteous, and prompt when dealing with others,
 - 7.1.2. make fair decisions when dealing with subordinates,
 - 7.1.3. respect and value a diversity of views and opinions,
 - 7.1.4. not unfairly discriminate on the basis of race, language, gender, religion, sexual orientation, disability, medical condition, cultural background, marital status and/or political affiliation; and
 - 7.1.5. not harass or intimidate other Members or Members of the public.

8. OUTSIDE WORK

- 8.1. FS184-CIP acknowledges the desirability (and even the necessity in some instances) for Members to be exposed to and to be involved in fields of business or professional practice.
 - 8.1.1. The conditions and provisions that apply to outside work undertaken by full-time Corporate Members is regulated by the Regulations Regarding Outside Work: Full-Time Staff.
 - 8.1.2. The conditions and provisions that apply to outside work undertaken by part-time Corporate Members are regulated by the Regulations Regarding Outside Work: Part-Time Staff.
- 8.2. Outside work must not have a negative impact on a Member's ability to render his or her services in FS184-CIP. A Member will not be allowed to do outside work if his or her performance is not on a satisfactory level.



- 8.3. Outside work done in a private capacity may not be advertised or performed in a way that creates or may create the impression that it is done in the name of FS184-CIP or in the name of a business unit of FS184-CIP or that FS184-CIP underwrites the project.
- 8.4. Members must obtain permission from FS184-CIP for the use of any FS184-CIP asset in the execution of outside work. If permission is granted, the Member is obliged to compensate FS184-CIP for the use of such asset.
- 8.5. Members are entitled to apply for outside work if the work is to be done outside of their normal working hours or during vacation leave, which permission will not unreasonably be withheld.
- 8.6. Where Members do outside work in a private capacity at other organisations like FS184-CIP, or where they are rendering a service or serving in a managerial capacity in such organisations or institutions, the written permission of the EXCO must be obtained.
- 8.7. Members must annually apply via their line manager to the relevant Executive for permission to do outside work. Permission granted lapses at the end of the calendar year or specific period for which it was approved. In the case of an Executive, applications must be made to the Board.
- 8.8. Contravention or abuse of the above-mentioned provisions may lead to a summary withdrawal of the permission and/or appropriate disciplinary proceedings.

9. DIRECTORSHIPS

- 9.1. It is the policy of FS184-CIP to allow Members of FS184-CIP to serve on the Board and the boards of other organisations. A Member must obtain approval from his or her line manager to serve as a director. FS184-CIP is entitled, in its discretion, to decline such a request in appropriate circumstances.

10. CONFLICTS OF INTEREST

- 10.1. A “**conflict of interest**” can be defined as follows:

“Any situation in which an individual or corporation (either private or governmental), is in a position to exploit a professional or official capacity in some way, for their personal or corporate benefit.”

In order to prevent situations where a Member’s conduct is induced or appears to be induced by a conflict of interest or a potential conflict of interest, and to determine whether an “interest” of a Member indeed fits this category, a full disclosure of interests is mandatory.

- 10.2. Members are obliged to, in writing:

- 10.2.1. before assuming office, and



- 10.2.2. whenever a new interest arises,
 - 10.2.3. declare any business, commercial or financial activities undertaken for financial or other gain that may raise a conflict of interest or a possible conflict of interest with FS184-CIP.
- 10.3. During his or her employment with FS184-CIP the Member must notify FS184-CIP in writing of any conflict or possible conflict of interest, before FS184-CIP procures any goods or services from the said Member or an organisation in which the Member holds an interest.
- 10.3.1. Declarations of any possible conflicting interest must be made immediately upon arising or as soon as the Member becomes aware of the possible conflict of interest.
 - 10.3.2. All Members must prepare an annual declaration of possible conflicts of interest that affects FS184-CIP and them personally that they might be aware of.
 - 10.3.3. Where applicable, the Member must recuse himself or herself from any decision-making process where an actual or deemed conflict of interest is present. The nature of the conflict of interest and the fact that the Member recused himself or herself must be noted fully in the minutes of the proceedings.
- 10.4. With regard to the sale of goods and the rendering of services to FS184-CIP, in circumstances where a conflict of interest exists or may exist on the part of the Member in respect of the transaction, Members are not entitled to:
- 10.4.1. Conduct business directly or indirectly with FS184-CIP that entails or may entail a conflict of interest with FS184-CIP, unless the Executive of FS184-CIP is of the opinion and takes a decision that –
 - 10.4.1.1. the goods, product or service in question are unique,
 - 10.4.1.2. the supplier is a sole provider, and
 - 10.4.1.3. it is in the best interest of FS184-CIP.
- 10.5. With regard to the conduct of business with or rendering of services to FS184-CIP the following is applicable:
- 10.5.1. A Member may not, on behalf of FS184-CIP, contract with himself or herself, or his or her relative, or any entity in which he or she (the Member), or any relative has a direct or indirect financial or personal, fiduciary or other interest.
 - 10.5.2. The following is indicative of a direct personal or financial interest in such an entity:



- 10.5.2.1. Where the Member is the director or a shareholder of a private company, the general partner in a partnership or the claimant of the profit of an entity.
- 10.5.3. The following is indicative of an indirect personal or financial interest:
- 10.5.3.1. Where a Member has no direct personal or financial interest in a private company (or other entity) but uses the said private company (or other entity) as a mere conduit or front, in order to receive personal or financial gain from doing business with FS184-CIP.
- For example: A Member acting on behalf of FS184-CIP provides goods in his private capacity to ABC (Pty) Ltd and the latter sells it to FS184-CIP. Whether a Member is using a conduit to do business with FS184-CIP or not, is a factual question.
- For example: If a Member benefits financially from a transaction between FS184-CIP and a family Member of the said Member this will fall foul of the prohibition in par 10.4. FS184-CIP therefore will not be able to conduct business with the said family Member of the Member (e.g. married couples).
- If the said Member does not financially or personally benefit from the fact that FS184-CIP is doing business with a family Member of the Member, it could not be said that the Member is indirectly doing business with FS184-CIP. However, it remains a conflict of interest and the Member will have to disclose and to recuse himself or herself from the decision-making process. "Conflict of interest" is a wider concept than "doing business"
- 10.5.4. Contracting as referred to above relates to conduct that is aimed at receiving any direct or indirect financial, personal, fiduciary, or other gain by the Member which does not form part of the employment relationship between the Member and FS184-CIP.
- 10.5.5. A Member may not sign any document related to the conduct of business or the rendering of services on behalf of FS184-CIP if he or she does not have the designated authority to do so.
- 10.6. Transactions by Members that do business with FS184-CIP which meet the stipulated criteria as determined by the Executive and this Code are not prohibited.



Note: See the saving clause in par 10.3. Even in instances where “doing business” is allowed, it remains a conflict of interest. The relevant Member will have to recuse himself or herself from the decision-making process.

- 10.7. Direct or indirect transactions by Members with FS184-CIP resulting in direct or indirect personal gain on the part of the Member but which form part of the employment relationship are not prohibited.
- 10.8. The trust that is placed in FS184-CIP Members requires that all Members conduct themselves with integrity, objectivity, professionalism, and due care. Members should therefore avoid conflicts between their FS184-CIP duties and private interests.

11. USE OF FS184-CIP RESOURCES

- 11.1. Members must use FS184-CIP resources with the required care. Unless express permission has been granted, FS184-CIP resources may not be used for private purposes.
- 11.2. For the purposes of this Code the following are regarded as FS184-CIP resources:
 - 11.2.1. FS184-CIP assets
 - 11.2.2. FS184-CIP funds
 - 11.2.3. Skills and time of Members
 - 11.2.4. Electronic resources (email, internet, telephone).
- 11.3. FS184-CIP assets
 - 11.3.1. Members are responsible for assets placed under their control. These assets should be treated with the appropriate care and secured against theft and misuse. Any loss or damage to these assets must be reported immediately.
 - 11.3.2. Members must use FS184-CIP assets for the purpose for which it is normally intended and in accordance with the directions for use pertaining to the assets.
 - 11.3.3. Members should not remove FS184-CIP assets from the premises, except where this is necessary for the Member to conduct FS184-CIP business outside the premises, and the necessary permission has been granted.
- 11.4. FS184-CIP funds
 - 11.4.1. Where a Member controls FS184-CIP funds he or she must display the same care and prudence in dealing with these funds as is demanded from a reasonable and competent manager.
 - 11.4.2. Members may not spend FS184-CIP funds without authorisation.



11.4.3. Where a Member spends money or authorises that money be spent on behalf of FS184-CIP, he or she should ensure that FS184-CIP receives value for the money spent.

11.4.4. No Member may without the permission of the Executive Member responsible for Finance open a bank account on behalf of or in the name of FS184-CIP, a department, division, centre, institute, residence, society, sports club, or any similar operating division in FS184-CIP.

11.5. Skills and time of Members

11.5.1. Members are required to make reasonable use of the available training and development opportunities in FS184-CIP to continuously enhance their skills. Line managers should ensure that Members are afforded the time and opportunity to enhance their skill levels.

11.5.2. Members should utilise their work time effectively and ensure that it is spent on productive, work-related activities.

11.6. Electronic resources

11.6.1. The Electronic Communications Policy of FS184-CIP regulates the use of FS184-CIP's electronic infrastructure and facilities.

11.6.2. The general standards of conduct for all users of FS184-CIP's computing resources are specified in the Policy on Acceptable Use of Computing Resources.

11.6.3. Electronic resources such as email and internet access are provided to Members for their employment activities and should therefore be used for this purpose.

12. GIFTS AND BENEFITS DECLARED

12.1. The receipt of gifts is regulated by FS184-CIP's Policy on Gifts.

12.2. Members are allowed to accept gifts on behalf of FS184-CIP, provided that these gifts are not given with the purpose of improperly influencing a Member. If the slightest possibility exists that a gift is given as a *quid pro quo* to induce preferential treatment, it must be declined.

12.3. Before a Member receives a gift, approval must be obtained from the relevant Member's line manager. The gift should be disclosed on a prescribed form and recorded in a gift register.

12.4. *In natura* donations, which include fixed property, apparatus, works of art, library material, archive and museum material and personal memorabilia are regulated in terms of the Policy on *In Natura* Donations to FS184-CIP.



- 12.5. No Member, independent contractor, or supplier may accept cash as a gift under any circumstance.

13. FRAUD AND CORRUPTION

- 13.1. FS184-CIP's Fraud Policy and Response Plan formalises FS184-CIP's position with regard to fraud and corruption and reinforces existing systems, policies and procedures aimed at deterring, preventing, detecting, reacting to and reducing the impact of fraud and corruption. FS184-CIP has a policy of zero tolerance towards fraud and corruption.
- 13.2. Members or prospective Members, independent contractors, temporary personnel Members, volunteers and suppliers or any other related parties are required to minimise FS184-CIP's exposure to fraud and corruption by abiding with FS184-CIP's Fraud Policy and Response Plan.
- 13.3. FS184-CIP's Whistle-blowers' Policy is *inter alia* aimed at encouraging and enabling Members and external parties to raise concerns within FS184-CIP rather than merely ignoring a problem or blowing the whistle through inappropriate channels.
- 13.4. In terms of the Policy, Members and "Whistle-Blowers" are responsible for reporting any suspected fraud, corruption, criminal activity, unethical conduct, maladministration, or mismanagement.
- 13.5. The [Whistle-Blowers Form](#), which can be submitted anonymously, is available on the FS184-CIP website, at:

<https://fs184.cip21.online/forms/whistle-blower/>

14. IMPROPER INFLUENCING AND BRIBERY

- 14.1. No Member may bribe or improperly influence or attempt to improperly influence any person who is or may be assumed to be in a decision-making position regarding FS184-CIP matters.
- 14.2. No Member may create the impression that he or she has the power to improperly influence the outcome of or the people entrusted with appointments and selection decisions, the procurement of goods or services and the awarding of tenders and/or drawing up of quotations.
- 14.3. A Member is obliged to immediately report any attempt by another person to bribe or to improperly influence him or her to his or her line manager.

15. LIFESTYLE AUDITS

- 15.1. A Lifestyle Audit is described as:



- 15.1.1. An audit carried out with specific attention on income received by individuals, and these reports are an amalgamation of reports from a variety of databases that aim to give a snapshot of certain related aspects of the life of a Member.
- 15.2. Lifestyle Audits are an essential process in maintaining the core values of corporate governance as enshrined in this Code of Conduct, and the principles of ethical- and effective leadership.
 - 15.2.1. Corporate governance, under the auspices of the King Report, is defined as the exercise of ethical and effective leadership by the governing body towards the achievement of the following governance outcomes:
 - 15.2.1.1. Ethical culture
 - 15.2.1.2. Good performance
 - 15.2.1.3. Effective control
 - 15.2.1.4. Legitimacy (www.iodsa.co.za).
 - 15.2.2. Ethical and effective leadership should complement and reinforce each other:
 - 15.2.2.1. Ethical Leadership is exemplified by integrity, competence, responsibility, accountability, fairness, and transparency. It involves the anticipation and prevention, or otherwise amelioration, of the negative consequences of the organisation's activities and outputs on the economy, society and the environment and the capitals that it uses and affects.
 - 15.2.2.2. Effective Leadership is results-driven. It is about achieving strategic objectives and positive outcomes. Effective leadership includes, but goes beyond, an internal focus on effective and efficient execution.
- 15.3. Scholarly research on lifestyle audits, coupled with the 2019 State of the Nation Address by President Cyril Ramaphosa on the subject, supports Lifestyle Audits ('President Cyril Ramaphosa: State of the Nation Address 2019' (www.gov.za)).
- 15.4. As such, each executive officer and manager will be subject to periodic Lifestyle Audits, by a reputable and qualified external Auditor, in compliance with this Code of Conduct, and as contemplated in section 21 - MONITORING AND ENFORCEMENT.

16. USE OF OFFICIAL CONFIDENTIAL AND PERSONAL INFORMATION

- 16.1. All individuals at FS184-CIP who have access to information owned by FS184-CIP are expected to know and understand the relevant access and privacy requirements and are expected to take measures to enforce the confidentiality and security of information throughout the organisation.



- 16.2. The Information and Data Governance Framework Policy defines the principles and guidelines for managing organisational information owned by or processed by FS184-CIP for any purpose or in any form.
- 16.3. FS184-CIP is committed to keeping personal information regarding its Members confidential. Access to and knowledge of the content of Member records will be limited to persons who need the information for legitimate FS184-CIP business or legal purposes.
- 16.4. Members dealing with personal information must be aware of the purposes for which the information has been collected, and only process the information for that purpose in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA) and the Promotion of Access to Information Act 2 of 2000 (PAIA).
- 16.5. Members may not impart, without authorisation, confidential and/or personal information (including business strategies, pending contracts, unannounced services, research and statistical results and any other information that is not in the public domain) to any person, company, or entity where such person, company or entity is not legitimately entitled to the information.
- 16.6. The Information Classification Policy is aimed at assisting Members to determine what information can be disclosed to external parties, as well as the sensitivity and/or confidentiality of information that should not be disclosed outside of FS184-CIP.
- 16.7. The Policy on the Use of Public Cloud Computing Services applies the principles of the Information Classification Policy to ensure the secure and responsible use of public cloud services.
- 16.8. Members must take care to maintain the integrity, confidentiality, and privacy of all FS184-CIP documentation and information to which they have access, which are classified as confidential information or may be regarded as confidential information by the nature thereof.
- 16.9. FS184-CIP's Information Technology Security Policy identifies the rules for all individuals accessing, using, maintaining, administrating, or managing FS184-CIP's IT assets and resources. Its objective is the preservation of confidentiality, integrity and availability of systems and information used by FS184-CIP's Members as well as compliance with other applicable FS184-CIP policy and South African legislation.
- 16.10. All reasonable precautions must be taken, including the use of both physical and electronic barriers, such as locks, passwords, and file protection measures, to prevent any unauthorised access or misuse of confidential information.
- 16.11. FS184-CIP's Password Policy clarifies the responsibilities of users regarding the management and use of passwords to prevent unauthorised access to or theft of information and information-processing facilities.



17. HEALTH AND SAFETY

- 17.1. Members and other individuals acting on behalf of FS184-CIP are required to take reasonable care of their personal health and safety as well as the health and safety of others in FS184-CIP. For this purpose, Members are to follow safe workplace practices, including participating in applicable training sessions, using appropriate personal safety equipment where required, and reporting accidents, injuries, and unsafe situations.
- 17.2. In the event of a national state of emergency called by the President of South Africa, FS184-CIP and its Members will comply with national regulations, where such regulations may be promulgated from time to time.
- 17.3. Members should protect FS184-CIP and the surrounding environment from pollution and contamination. This includes the careful handling of hazardous waste and other potentially harmful agents and materials.
- 17.4. Members, and other individuals acting on behalf of FS184-CIP, should ensure that they do not attend work or perform duties while under the influence of alcohol, drugs or any other intoxicating substances or the after-effects thereof.

18. PUBLIC COMMENT ON BEHALF OF FS184-CIP

- 18.1. When making written or oral comments which can reasonably be ascribed to be the official view of FS184-CIP and which can reasonably be expected to become public, Members must ensure that they have the required authorisation to speak on behalf of FS184-CIP. If no such authorisation is given, Members should refrain from making comments or statements that could be interpreted as a statement made on behalf of FS184-CIP.
- 18.2. Where a Member makes public comments in connection with their personal activities at a labour union, political party, or any community activity, it should be made clear that such comment is made on behalf of the union, political party or association which they represent and not in his or her capacity as a Member of FS184-CIP.

19. INTERPRETATION

- 19.1. This Code should be read in conjunction with existing policy documents and regulations of FS184-CIP. The Code is not only an abridged version of rules already contained in other policy documents and regulations, but also contains additional guidelines. The Code forms part of FS184-CIP's Policy system and as such it is binding on all Members of FS184-CIP.
- 19.2. If any provision in this Code is in conflict with any applicable legislation, such legislation shall enjoy precedence. If a local custom or policy conflicts with this Code, the Code must be complied with. All Members, including the Board, executive officers and management are required to familiarise themselves with the legal and policy requirements that apply in FS184-CIP, specifically as it applies to their area of work. They are also required to



report any *prima facie* (on the face of it) transgressions of the law, this Code or any FS184-CIP policy.

- 19.3. If any immoral or unethical action or behaviour is not specifically addressed in this Code, actions should still be guided by the vision, mission, and value system of FS184-CIP as well as generally accepted ethical business practices.

20. COMPLIANCE WITH THE CODE OF CONDUCT

- 20.1. The Board, executive officers, management, all Members, and other individuals acting as volunteers and representatives on behalf of FS184-CIP must familiarise themselves with this Code and ensure that they comply with the letter as well as the spirit, being the intention and the content, of the Code.
- 20.2. Each executive officer and manager are responsible for providing guidance to individuals affected by this Code.
- 20.3. All Members of FS184-CIP are required to adhere to the highest standards of excellence and morality in all their activities.
- 20.4. All breaches of this Code may be regarded as misconduct and may result in disciplinary action up to and including dismissal as per FS184-CIP's Disciplinary Code and Procedure for Members.
- 20.5. Any person is entitled, in terms of the Whistle-blowers Policy, to disclose non-compliance with the Code.

21. MONITORING AND ENFORCEMENT

- 21.1. The primary responsibility for ensuring compliance with the Code of Conduct rests on each individual Member and his or her line manager.
- 21.2. Each executive officer and manager will be subject to Lifestyle Audits, as contemplated in section 15 - LIFESTYLE AUDITS.
- 21.3. Every Member has the right and responsibility to ask questions, seek guidance and express concerns regarding compliance with the Code.
- 21.4. Members should promptly report all suspected breaches of the Code of Conduct to their line manager. If this is not possible, the Member may report the suspected breach anonymously as set out in the Whistle-Blowers Policy, which purpose it is to provide an open and transparent way to raise serious concerns that are in the public interest. The raising of such concerns can make a positive difference, alerting FS184-CIP to serious risk or malpractice that might otherwise take time to come to light. The details of the Whistle-Blowing hotline are as follows:

- 21.4.1. <https://fs184.cip21.online/forms/whistle-blower/>



- 21.5. In the final instance, the Audit and Risk Management Committee is responsible for monitoring Members comply with the provisions of this Code.



22. PERSONAL DECLARATION & ENDORSEMENT

22.1. I, the undersigned, herewith declare and undertake:

22.1.1. I am a paid-up Member of the FS184-CIP,

22.1.2. I am familiar with, and subscribe to, support, and will propagate the vision, mission, principles, policy, and programs of the FS184-CIP,

22.1.3. I have read and understand the provisions of this Code of Conduct and will abide by it,

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|---|
| SIGNED at _____ on _____ 20____ |
| I am duly authorized to endorse this Code and agree to be bound by the terms and conditions herein. |
| Signature _____ |
| Name: _____ |

END OF DOCUMENT