



# **Business ethics Policy**

Contents:

1. Introduction
2. Values
3. Policy
4. Reporting non-Compliance and Monitoring
5. Business Conduct and Ethics Guideline
6. Conclusion

Read with:

Annexure A: Business Conduct and Ethics Guideline

Compiled by:

L Bierman

Date: 12/5/2021

Recommended by:

SEC: L Molefe

Date: 12/5/2021

Approved by:

Social and ethics committee  
Date: 12/5/2021

# Business Ethics Policy

## 1. Introduction

The ethical performance of an organisation is the total of the ethical performance of everyone who works for it. Thus all enX Group Limited (“enX”) employees owe our employer a duty of honesty, diligence and integrity.

The code of ethics applies to employees, non-executive directors, as well as contractors, consultants and others who may be temporarily assigned to perform work or services for the Group. The Code of Ethics will be made available in hard copy and on all Group websites.

Ethics refers to standards of conduct, which indicate how individually and collectively an organisation should behave based on moral duties and virtues arising from principles about right and wrong. It defines our values in greater detail and provides ethical guidance on how we do business, make decisions, interact with and protect the interests of our stakeholders.

## 2 Values

Our reputation is one of our most important assets a maintaining the trust and confidence of all those whom we deal with is a vital responsibility. At all of our Business Units we value:

1. Power is created through shared knowledge  
Sharing our experiences builds long-term trust relationships.
2. Excellence with urgency  
Doing it right the first time, on time.
3. Listen, think, respond  
Understanding leads to better communications and outcomes.
4. Own your actions  
Make the business your own. Take responsibility and be accountable, no excuses.
5. Work to inspire, work to respect  
Inspiration grows our business. Trust and respect forms our foundation.
6. Challenge the way ‘it’s always been done’  
Allowing creative ideas resulting in innovative solutions to keep us ahead.

### 3 Policy

- 3.1 Compliance with enX's policy on ethical business conduct and behaviour is required of all employees, contract labour, consultants, temporary employees, part-time employees, casual employees, occasional employees and others acting for enX must also comply with this policy.
- 3.2 enX is committed to competing honestly and fairly and we support and comply with all antitrust and fair competition laws in all markets where we do business. Antitrust and fair competition laws vary by country, but all are designed to stop competitors from creating agreements that prevent, restrict or distort the exercise of free competition.
- 3.3 enX does not allow conflict of interest practices where an employee has a personal interest that could be seen to have the potential to interfere with his/her objectivity in performing his/her duties or exercising his/her judgement on behalf of enX. Any such personal interest on the part of an employee, or a member of his/her family, is not permitted unless approved in writing.
- 3.4 enX respects and values the cultural diversity of its customers and employees. enX also respects its employees' personal privacy, but it does expect them to be law-abiding and to conduct their personal affairs like good and responsible citizens, especially where any indiscreet or antisocial behaviour could affect the individual's performance or reflect badly on enX.
- 3.5 enX is committed to achieving environmental, health and safety excellence. The company strives to provide a safe and healthy working environment and to avoid harming the environment and the communities in which it operates.
- 3.6 enX's resources are meant to serve enX's purposes and we do not tolerate the use thereof for personal gain, directly or indirectly.

### 4. Reporting non-Compliance and Monitoring

#### 4.1 Reporting non-compliance

Employees should report / disclose any actions or activities in contravention with this policy directly to management or alternatively disclosures may be executed through the enX Tip-Off Hotline on 0801 122 566 inside South Africa or via e-mail to: [enX@tip-offs.com](mailto:enX@tip-offs.com). Anonymity of complaints will be protected.

#### 4.2 Monitoring

enX monitors ethical performance regularly in order to ensure that corrupt or unethical business practices are eliminated.

The Social and Ethics Committee will monitor the company's activities in light of:

- relevant legislation, other legal requirements and codes of best practice relating to social and economic development, good corporate citizenship, the environment, the health and public safety, consumer relationships, labour and

employment

- and draw matters within its remit to the boards attention and also to report to shareholders at each AGM on items that are material in nature

We encourage you to discuss situations that potentially or actually violate any applicable law, regulation or policy, with your CEO or, if your CEO is involved in the situation or you are uncomfortable speaking with your them, contact the Group CEO, CFO or Chairperson of the Audit and Risk Committee.

If you have a good-faith concern regarding conduct that you believe to be a violation of a law or regulation, Company policy, or you reasonably believe you are aware of questionable financial or accounting matters following the above suggested reporting lines.

If you have knowledge of a potential violation and fail to report it via the process set forth above, you may be subject to disciplinary action, up to and including termination of employment.

enX will not retaliate, and will not permit any retaliation, against any individual for filing a good-faith concern to management nor for participating in the investigation of any such complaint.

## **5 Business Conduct and Ethics Guideline**

The extended ethical and behavioral framework by which we operate is outlined in the **Business Conduct and Ethics Guideline: Annexure A** and it is expected that all employees should sign the acknowledgement thereof. It defines how we should conduct ourselves with integrity, both as team members and as decision makers. Accordingly, this guideline sets overall principles for practice to be adopted throughout enX. Business Units within enX are required to adopt these principles and processes to deal with specific ethical issues that arise in their specific circumstances.

## **6 In conclusion**

We recognise our obligations to all our stakeholders, i.e. shareholders, employees, customers, suppliers, competitors and the wider community.

It is up to all employees to ensure that enX demonstrate uncompromising integrity and the highest ethical standards in business conduct every day. The CEO will champion the Business Ethics Policy.