



ETHICS POLICY

(“The Policy”)

KGABO BENEFIT CONSULTING (PTY) LTD

(“Company”)

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Responsible Person	Key Individual

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1. INTRODUCTION

The company has always been committed to conducting business in an open and transparent manner. Given the growing importance of ethics and the potential scope for unethical behaviour within the workplace, it is necessary to further articulate and solidify the company's commitment to establishing an ethical business culture. Therefore, this Policy has been adopted by the members of the governing body, and applies equally to all directors, employees and representatives of the company.

The company is committed to establishing and fostering ethical and effective leadership by the governing body to enable the company to achieve a number of identified governance outcomes. One of the primary outcomes is the creation of an ethical business culture. Ethical leadership encompasses values such as honesty, competence, responsibility, accountability, fairness and transparency.

Ethics and integrity form the foundation of corporate governance, and as such the company regards the subject of ethical conduct as the foundation upon which the company has structured itself. Given the potential reputational and financial losses that unethical conduct can incur, initiating and entrenching an ethical culture is a necessary company goal, one that the company takes seriously.

Furthermore, the ethical culture of the governing body and the employees of the company, is an absolute requirement in order to ensure that the risk management structure of the company is effective.

2. DEFINITIONS

2.1 Ethics

Ethics refer to moral principles that govern a person's behaviour or the conducting of an activity.

2.2 Integrity

Integrity means the quality of being honest and having strong moral principles.

2.3 Responsibility

Responsibility means the state or fact of having a duty to deal with something and being accountable for any action that you take.

2.4 Transparency

The exercise of accountability in such a manner that any decision-making activities are aligned with the company's ethical values.

2.5 Values

Principles and views informing the behaviour of the company and its employees.

2.6 Governing Body

The governing body refers to a person or group of people that govern a company, sets directions and holds top management accountable.

3. POLICY PURPOSE

The company recognises that ethical governance is imperative to ensure that the company's strategic objectives and outcomes are achieved. In light of the aforementioned, steps must be taken to ensure that policies and procedures establishing an ethical culture are established and maintained in accordance with an explicit governance process whereby the roles and responsibilities of those involved, are clearly defined and separated.

The main purpose of this Policy is therefore to enforce the company's commitment towards the Policy Statements and any supplementary Standards, Procedures and Best Practice Principles which provide support and direction to this Policy.

4. POLICY STATEMENTS

4.1 THE FSP AND MEMBERS

The company commits itself to the following ethical principles and practices:

4.1.1 INTEGRITY

Integrity entails the exercise of the company's and its employees' responsibilities in an honest and transparent manner. This means that the company is committed to go beyond everyday compliance and will strive to always implement its policies and practices in an ethically suitable manner.

4.1.2 ACCOUNTABILITY

The members of the FSP are accountable for the execution of their responsibilities.

4.1.3 TRANSPARENCY

The members of the governing body are committed to exercising ethical governance and any responsibilities in a transparent manner.

4.1.4 RESPONSIBILITY

The members of the governing body assume responsibility for determining the direction of the company, and will:

Approve all policies and regulatory procedures; and Monitor implementation by management.

4.2 ENCOURAGING ETHICAL CONDUCT

- The governing body is committed to implementing policies and procedures in such a manner which enhances the execution of ethical conduct by the company and its employees.
- The company will adhere to the applicable regulatory requirements as imposed by legislation, regulations and best practice guidelines.
- The ethical principles to which the company will adhere to are contained in the code of conduct of the company.
- The employees of the company are instrumental to achieve the effective implementation of an ethical culture within the company. The governing body will therefore ensure that all employees have

familiarised themselves with any policy and code of conduct which aims to enhance the company's ethical culture. The aforementioned will be achieved by creating awareness and establishing the appropriate training and induction programmes.

- The governing body will delegate to management the responsibility of ensuring that the implementation and execution of the abovementioned codes of conduct and ethics policies are seen to be done. Despite the aforementioned delegation, the governing body will still exercise ongoing oversight of managing ethics within the company, with specific reference to the monitoring of adherence to the company's ethical standards by employees.
- An ethical culture is largely dependent on compliance with the regulatory requirements which are applicable to the company. The governing body therefore re-emphasises the company's commitment to the established compliance function within the company. Any non-compliance with regulatory requirements will be seen as unethical conduct, which may result in immediate dismissal.

I, the Key Individuals of the aforementioned Company, hereby confirm the adoption of the **Ethics Policy**.

Key Individual Name

Mr. T Setswe

Signature

