



## **Ethics Management Policy**

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## **1. Introduction**

Sasria SOC Ltd (Sasria) acknowledges that the establishment of a corporate ethical culture is the ultimate objective of managing organisational integrity. In this regard Sasria has built an ethical culture in a formal way by establishing a Social and Ethics Committee of the Board; setting out and adopting the organisational values; compiling an ethics risk and opportunity profile; developing and adopting an ethics management policy; integrating ethical standards with the day to day activities within the organisation; and reporting on and disclosing the company's ethics performance.

## **2. Policy Statement**

Sasria accepts the need to manage organisational ethics and integrity to build an ethical corporate culture. The Board is cognisant of its responsibility for setting the tone for effective leadership based on an ethical foundation. Sasria's corporate values and ethics risks inform the architecture of Sasria's organisational code of ethics. Sasria further commits itself to conducting its business in a fair, ethical and honest manner in the interests of its stakeholders and the insurance industry.

## **3. Regulatory Framework**

The regulatory frameworks for training and development of directors are provided by - Prevention and Combating of Corrupt Activities Act, 2004

- The Companies Act, 2008
- Public Finance Management Act, 1999
- King IV Report on Corporate Governance for South Africa, 2016
- Board Charter of Sasria SOC Ltd

## **4. Purpose of this Policy**

The purpose of this policy is to provide understanding of the corporate values and principles set out by the Board of Sasria in relation to ensuring that the ethical standards guiding the company's relationships with internal and external stakeholders are clearly defined. This policy seeks to create a balance between the objectives of curbing negative ethics risks and taking advantage of opportunities associated with a strong ethical culture. The policy further promotes linking of the core values of Sasria to rules and guidelines, illustrating the behavioural expectations of the values.

## **5. Policy Implementation**

The following principles govern and support Sasria's ethical conduct practices. The policy shall be implemented in line with the values and ethical culture objectives adopted by Sasria and driven by Management:

- a) Adoption of corporate ethical values, establishing a Social and Ethics Committee, and adopting an Ethics Management policy.
- b) Linking core ethical values to rules and guidelines illustrating the behavioural expectations of each value.
- c) Identification and assessment of ethics risks and opportunities.
- d) Development of a code of ethics, a code of conduct and relevant policies.
- e) The code of ethics will set ethical standards indicating how internal and external stakeholders should act, beyond legal compliance.
- f) Integration of ethical standards with day to day activities within the organisation.
- g) Reporting and disclosure of ethics activities to relevant stakeholders.

- h) Assessing the employee understanding of the values and ethical standards of Sasria through an annual ethics and integrity questionnaire for all staff. This questionnaire shall have set targets of staff performance in reflecting their understanding, which will be set by Exco. The timing of the assessment during the financial year will also be set by Exco. All these targets will be included in the Ethics Management procedures.
- i) Holding of a governance week session twice per financial year during Quarter 2 and Quarter 4.
- j) The governance week shall cover training and awareness of all Sasria staff on the following matters: policies relating to regulatory requirements; compliance matters and new laws; fraud prevention and whistleblowing awareness; conflict of interest management update; and other.
- k) Ensuring that all employees are able to consistently make the right ethical choices in a variety of work-related situations, some of which may be ambiguous.
- l) Sasria's expected standard of employee and stakeholder conduct is underpinned by an unwavering commitment to uphold the following primary principles of ethical conduct described below. These principles are not intended to be exhaustive; they do however offer a "touchstone" against which high-level compliance to the Sasria Ethics Management Policy can be measured -
  - i. Sasria will always abide by the spirit and the letter of the law in the way that we conduct our business. We will not tolerate involvement in any illegal acts whatsoever, examples of which include bribery, insider trading and tax evasion;
  - ii. Sasria will always act in the best interests of our customers paying particular regard to their expectations of product quality, product safety, competitive pricing and advertising that is not false or misleading;
  - iii. Sasria will always maintain strictly professional relationships with suppliers of goods and services, we will specifically not engage in any activity or accept gifts, favours or hospitality that may compromise our ability to deal with our suppliers objectively and without special favour;
  - iv. Sasria will always strive to create a stimulating and safe working environment that is underpinned by respect for the rights of individuals and that is free of prejudice in all its guises. We will stamp out abusive behaviours such as Sexual Harassment, Gender Discrimination and Racial Discrimination whenever we encounter them;
  - v. Sasria will always compete fiercely in our chosen markets, but we will not resort to dishonest tactics in order to gain advantage over our competitors. This will include avoiding improper methods to gain access to the confidential information of our competitors;
  - vi. Sasria will always remain accurate and reliable records that provide a fair representation of all business transactions and that are consistent with International Financial Reporting Standards (IFRS), as well as our legal and financial reporting obligations;
  - vii. Sasria employees will always perform their responsibilities professionally, honestly and in a way that serves legitimate business interests of our stakeholders. This will include avoiding conflicts of interests, not engaging in theft of company property, utilizing company assets for legitimate business purposes only and protecting confidential information;
  - viii. Sasria will always act as a compassionate and responsible Corporate Citizen that is in touch with the issues facing the communities in which we operate. We will be particularly committed to participating effectively in social upliftment initiatives, proactively advancing the process of Black Economic Empowerment and demonstrating sensitivity to the impact that our activities and our trading partners activities have on the natural environment;
- viii. These principles are supplemented by additional Codes, Policies and Procedures that prescribe the required standard of conduct governing specific situations. These Codes,

Policies and Procedures, with which all employees are expected to be familiar, are available to all employees and are on the Sasria Intranet (Ulwazi);

- ix. We are ultimately reliant on the good judgement and integrity of all our associates and stakeholders if we are to maintain high standards of ethical conduct;
- x. Adoption of corporate ethical values, establishing a Social and Ethics Committee, and adopting an Ethics Management policy; and
- xi. This policy, practice and processes will be monitored by the Board, Risk Committee, Audit Committee, Management and the internal audit function to ensure compliance.

## **6. Roles and Responsibilities**

### **6.1 Social and Ethics Committee**

- (a) Annually reviewing and approving the Ethics Management Policy,

### **6.2 Executive Committee**

- (a) Ensuring full implementation of the policy approved by Social and Ethics Committee and approval of relevant processes, guidelines and procedures.

### **6.3 Management**

- (a) Conduct ongoing ethics promotion interventions to encourage an ethical culture in the company.

### **6.4 Compliance Officer**

- (a) Monitoring of compliance with policy.
- (b) Facilitating annual ethics and integrity questionnaire and keeping records of these.
- (c) Reporting on level of compliance with the policy to the management governance committees, relevant board committees.

### **6.5 All Staff**

- (a) Completion of annual ethics and integrity questionnaire to measure their understanding of the values and ethical standards of Sasria through an annual.

## **7. Failure to Apply of Adhere to the Policy**

Sasria views its Ethics Management Policy in a serious light and failure by any employee to adhere to this policy constitutes misconduct and may result in disciplinary action being taken against such employee in accordance with Sasria's human capital policies, as amended from time-to-time.

## **8. Revision of the policy**

- The policy will be reviewed at three-year intervals to ensure its relevance and alignment with applicable legal and governance requirements.
- Where relevant however policies may be reviewed earlier than the above three-year period where there are major changes and / or gaps identified in the policy or where a shorter policy review period is dictated by law or other form of regulation.