



CODE OF BUSINESS CONDUCT

- ACT WITH INTEGRITY
 - BE HONEST
 - FOLLOW THE LAW
- COMPLY WITH THE CODE
 - BE ACCOUNTABLE

CODE OF BUSINESS CONDUCT POLICY

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1. INTRODUCTION

- 1.1. Our Kaizen Technologies employees are required to maintain the highest ethical standards in carrying out our business activities. Our reputation is one of our most important assets. Maintaining the trust and confidence of all those with whom we deal is therefore one of our vital responsibilities.
- 1.2. At each of our Business Units: Trust, Integrity, Respect, Accountability, Teamwork and Customer Satisfaction must be used to guide and direct the way we do business. As such, all employees have a unique responsibility to conduct business with the highest levels of integrity and trust.
- 1.3. We recognise our obligations to all stakeholders with whom we have dealings. Accordingly, this Code of Conduct (“Code”) sets overall principles and guidelines for practice to be adopted throughout Kaizen Technologies.
- 1.4. This responsibility requires all members of Kaizen Technologies, its employees, partners and contractors to display total integrity in their actions at all times.
- 1.5. Total integrity means:
 - 1.5.1. Adhering to Kaizen Technologies’ business principles as described in Kaizen Technologies’ Code of Business Conduct policy;
 - 1.5.2. Complying with all laws; and
 - 1.5.3. Taking responsibility for own actions
- 1.6. Kaizen Technologies will monitor ethical performance regularly in order to ensure that corrupt or unethical business practices are eliminated.

2. PURPOSE

- 2.1. The purpose of the Code of Business Conduct is to outline Kaizen Technologies’ business principles and provide guidance on the ethical conduct of all persons representing or employed by Kaizen Technologies. It aims to guide and support employees to identifying, considering, understanding and appropriately responding to business ethics situations in the workplace and ensuring that they display total integrity in their actions and decisions at all times.

3. SCOPE

- 3.1. The Code of Business Conduct applies to all Kaizen Technologies employees, suppliers and partners contracted to the company.

4. **BASIC ETHICAL CONDUCT:** Ethics refers to standards of conduct, which indicate how employees should behave based on moral duties and virtues arising from principles about “right and wrong”.



4.1. Individual ethical conduct: Any individual's action should be aimed at the promotion of the common good of Kaizen Technologies. Behaviour which an individual consciously feels is against the common good of the organisation should be regarded as unethical. If you are not sure, ask for guidance.

4.1.1. Collective Ethical Conduct: Ethical business conduct by all employees (individually and collectively) will lead to a collective perception of Kaizen Technologies as an ethical organisation by customers, suppliers, retailers, communities and government.

4.1.2. Individual Choice - Ethics involves two aspects namely:

- 4.1.2.1. The ability to distinguish right from wrong.
- 4.1.2.2. The ability and commitment to act on that distinction and to do what is right.

4.2. Driving values: Values are individual self-chosen core beliefs and ideals. Ethical conduct and behaviour is always built on sound and accepted core ethical values.

4.2.1. All employees are expected to accept Kaizen Technologies' values:

- 4.2.1.1. Integrity and equity
- 4.2.1.2. Efficiency and effectiveness
- 4.2.1.3. Respect for the individual
- 4.2.1.4. Accountability
- 4.2.1.5. Initiative
- 4.2.1.6. Teamwork
- 4.2.1.7. Confidentiality

4.2.2. Every employee must clearly understand that the highest standards of integrity and professional ethics are fundamental values of Kaizen Technologies.

4.2.3. Acceptance of Kaizen Technologies' values will ensure:

- 4.2.3.1. Promotion and maintenance of the highest standards of professional ethics.
- 4.2.3.2. Efficient and economical use of resources.
- 4.2.3.3. Development of people, processes, activities, the environment, or society in general.
- 4.2.3.4. Unbiased, fair, impartial and equitable provision of service.
- 4.2.3.5. Fair responses to the needs of the clients / customers.
- 4.2.3.6. Accountability to the Government and the people of South Africa.
- 4.2.3.7. Provision of timely, accessible and accurate information.



- 4.2.3.8. Transparency.
- 4.2.3.9. Cultivation of good human resources management and career development practices to maximise human potential.
- 4.2.3.10. Employment of people management practices based on ability, objectivity and fairness.
- 4.2.3.11. Acceptance of the need to redress the imbalances of the past to achieve broad representation.

4.3. The importance of the code of business conduct:

- 4.3.1. Compliance to this Code will ensure that Kaizen Technologies staff display total integrity in all actions and decisions. Therefore any conduct of an employee, which constitutes a non-adherence to the Code, may result in disciplinary action, which may include a termination of employment.

4.4. Responsibility for compliance to the code with customers, suppliers and third parties

- 4.4.1. Compliance to Kaizen Technologies' Code of Business Conduct is the responsibility of each employee. Kaizen Technologies conducts its business fairly, impartially and ethically. It is committed to respecting rules as well as any laws governing its operation.
- 4.4.2. We believe that integrity in dealings with our customers, suppliers and third parties is a prerequisite for successful long term business relationships. This principle governs all aspects of Kaizen Technologies' approach to its customers and suppliers.
- 4.4.3. In all advertising and other public communications, untruths, concealment and overstatement will be avoided. We will never deliberately give inadequate or misleading descriptions of our products or services.
- 4.4.4. In accepting business, entering contracts, applying for rights/licences or any other matter/arrangement employees and/or intermediaries are expected to observe the highest standards of integrity, to act in the best interests of Kaizen Technologies and may not have any improper motive. Employees and/or intermediaries shall not use questionable/unethical methods or techniques, bribery or fraud to gain personal benefits, benefits for family/friends, benefits for the company or benefits for any other third party either directly/indirectly.
- 4.4.5. In dealing with customers, suppliers, intermediaries or third parties, employees and/or intermediaries may not give or receive money or gifts. Entertainment and small gifts



may be given or received by employees and/or intermediaries subject thereto that it is declared to the employee's manager.

4.5. Responsibilities of participants

4.5.1. Kaizen Technologies is required to:

- 4.5.1.1. Maintain and Update the Code of Business Conduct.
- 4.5.1.2. Control and sensitise employees' behaviour and to address contraventions of the Code.
- 4.5.1.3. Recruit and promote employees on the basis of their suitability for the job without unfair discrimination in terms of race, religion, national origin, colour, gender, age, marital status, sexual orientation or disability unrelated to the task at hand. This principle will be balanced against the requirement to address the issues of employment equity
- 4.5.1.4. Ensure a healthy and safe work environment
- 4.5.1.5. Encourage employees at all levels to develop relevant skills and competencies, through work-related training and through self-development, in order to progress their careers within Kaizen Technologies.
- 4.5.1.6. Not employ child labour
- 4.5.1.7. Ensure it will not evade tax obligations
- 4.5.1.8. Ensure it will not attempt to acquire information regarding a competitor's business by disreputable means. This includes industrial espionage, hiring competitors' employees to obtain confidential information, urging competitive personnel or customers to disclose confidential information, or any other approach which is not ethical.
- 4.5.1.9. Ensure it will not engage in restrictive trade practices or abuse any position of market dominance
- 4.5.1.10. Contribute to the economic wellbeing and social development of selected disadvantaged communities
- 4.5.1.11. Ensure that managers exemplify Kaizen Technologies' values and principles in the conduct of their daily responsibilities

4.5.2. Kaizen Technologies employees are required to:

- 4.5.2.1. Perform their duties with honesty and integrity
- 4.5.2.2. Ensure maximum productivity



- 4.5.2.3. Maintain reasonable and justifiable expenditure within authorised boundaries
- 4.5.2.4. Respect others and be sensitive to their rights.
- 4.5.2.5. Take responsibility and accept accountability for own actions and decisions taken. "The buck stops here".
- 4.5.2.6. Question those who may be acting in an apparently unethical way, and report conduct, which is or appears to be in conflict with Kaizen Technologies' Code of Business Conduct to management.
- 4.5.2.7. Report unethical behaviour by an employee or other stakeholder to management.
- 4.5.2.8. Refrain from making public statements or provide any information not in the public domain,
- 4.5.2.9. About the organisation except with the necessary authorisation.
- 4.5.2.10. Educate fellow employees about the Code of Business Conduct.
- 4.5.2.11. Treat all fellow employees with dignity and respect
- 4.5.2.12. Protect Kaizen Technologies' interests.
- 4.5.2.13. Not share or use information received in the course of business dealings, for personal gain or any purpose except that for which it is given.
- 4.5.2.14. Take every reasonable precaution to avoid injury to themselves, their colleagues and members of the public.
- 4.5.2.15. Not engage in any outside business interest or additional employment which could in any way conflict with the proper performance of duties, unless given specific written permission to do so by the Managing Director
- 4.5.2.16. Disclose any personal interest which an employee or a member of his or her immediate family has, which could conflict with Kaizen's business.
This conflict of interest could include directorships, significant shareholdings and employment of life partners and family members
- 4.5.2.17. Not commit fraud, dishonesty, theft, corruption, victimisation, intimidation, harassment, bullying or discrimination directly/indirectly
- 4.5.2.18. Not unfairly damage the reputation of competitors either directly or by implication or innuendo
- 4.5.2.19. Comply with all the rules, regulations and agreements that regulate Kaizen Technologies' operation, its systems and the Kaizen Technologies Code of Business Conduct.



4.6. The code of business conduct is not comprehensive:

4.6.1. The code of Business Conduct cannot possibly address every situation pertaining to business ethics. Employees could from time to time find themselves, through no fault of their own, faced with difficult ethical decisions that may not be specifically addressed by the code. In such cases, employees are advised to discuss such matters with their manager and their respective Director.

4.7. Who to contact when in doubt

4.7.1. This Code of Business Conduct is not intended to take the place of honest and open conversation.

4.7.1.1. When employees have a question, the employee's manager is often closest to the situation and best able to help.

4.7.1.2. If an employee is uncomfortable raising some questions with the manager, a member of the executive may be approached for assistance.

4.8. Status is as guidelines

4.8.1. The Code of Business Conduct provides guidelines on certain aspects of conduct which could reflect on ethical behaviour and which happens in organisations from time to time.

4.8.2. Guidelines on ethical business conduct have no relevance without a conscious commitment to personally live up to core values, act as a role model to fellow employees and be a role model for Kaizen Technologies in the relationship with Kaizen Technologies stakeholders.

4.9. Offering or accepting of business courtesies

4.9.1. Business courtesies are exchanged in order to strengthen and maintain good business relationships. A business courtesy is a gift or favour from a person or company regardless of whether a business relationship exists between Kaizen Technologies and that person or company, for which fair market value is not paid by the recipient. A business courtesy may be monetary or non-monetary.

4.9.2. Some examples of business courtesies

4.9.2.1. Gifts of any kind

4.9.2.2. Meals and drinks

4.9.2.3. Entertainment (including lodging, travel, tickets to events)

4.9.2.4. Transport

4.9.2.5. Discounts

4.9.2.6. Promotional items



- 4.9.2.7. The use of the suppliers, consultant's time or equipment.
- 4.9.2.8. Any other consideration of value including any below-market loan, discounted product or service, or subsidised social activity.
- 4.9.3. The purchase of Kaizen Technologies supplies and services from vendors and subcontractors may not be influenced by gifts, meals and entertainment travel or any other consideration of value.
- 4.9.4. General Guidelines for Employees
 - 4.9.4.1. Never accept or offer to anyone with whom Kaizen Technologies does or may do business a gift with a fair market value exceeding R500 except with the prior written approval of the Managing Director
 - 4.9.4.2. Never solicit a gift, meal, entertainment or other consideration of value for yourself, a member of your family or anyone else, from anyone with whom Kaizen Technologies has an actual or potential business relationship.
 - 4.9.4.3. Never accept a gift, meal, entertainment or consideration for yourself, a family member or anyone else that does or might appear to influence your objective judgment on behalf of Kaizen Technologies.
 - 4.9.4.4. Never offer a gift, meal, entertainment or consideration that does or might appear to influence the objective business judgment of anyone with whom Kaizen Technologies does or seeks to do business.
 - 4.9.4.5. Never offer a gift, meal, entertainment or consideration if acceptance of such would violate the standards of conduct of the recipient's organisation.
 - 4.9.4.6. Document and record all expenditures for gifts, meals and entertainment even if not reimbursed by Kaizen Technologies according to the Kaizen Technologies policy.
 - 4.9.4.7. Report to the Managing Director any violation of these guidelines of which you are aware.
- 4.9.5. The provision of Kaizen Technologies' products and services must be free from any perception that favourable treatment was sought, received or given on the basis of any Kaizen Technologies sponsored gift, meal, entertainment or other consideration of value such as travel and discounts.
- 4.9.6. Similarly, the purchase of Kaizen Technologies supplies and services from vendors and subcontractors may not be influenced by gifts, meals, entertainment, travel or any other consideration of value.



4.9.7. Kaizen Technologies employees must uphold all laws and contractual provisions when dealing with representatives of government entities or any other person in the course of their duties.

4.9.8. Representatives of government entities include anyone elected, nominated or appointed to public office (including public boards and commissions); employees of a government entity and those authorised to act on behalf of a government entity.

4.9.9. What to do with the offered unacceptable business courtesy

4.9.9.1. Kaizen Technologies employees should always try to anticipate and avoid situations that might lead to an offer of an unacceptable business courtesy. If such a courtesy is offered the employee or manager should politely refuse the business courtesy at the time it is offered and explain that the Kaizen Technologies policy prohibits the acceptance of the courtesy.

4.9.9.2. All business courtesies must be declared to the line manager and recorded in the business courtesies register in each department within 24 hours of receipt thereof.

4.9.9.3. If a manager determines that the business courtesy given to an employee should not be accepted and the gift is already in Kaizen Technologies' possession, it should be returned to the donor with a polite explanation that Kaizen Technologies' policy prohibits the retention of the business courtesy.

4.9.9.4. Anticipate and avoid situations that might lead to an offer of an unacceptable business courtesy.

4.9.9.5. An employee or manager may accept a business courtesy on behalf of Kaizen Technologies and then, after completing the register, transfer the gift to the Managing Director for donation to a charitable or educational organisation.

4.9.10. Business courtesy register

4.9.10.1. A system for recording of all business courtesies will be made available in all divisions/departments. These records must be available for inspection. All Managers must forward quarterly lists of received courtesies to the Directors.

4.9.10.2. The authority of the manager approving the acceptance of the courtesy must be specified in the register. The register is not a policing document but rather a record providing transparency and employee protection.



4.9.10.3. Non-disclosure will result in disciplinary action against the employee receiving the business courtesy and may result in dismissal.

4.10. Bribes and kickbacks

- 4.10.1. It is a criminal act to offer or receive any bribe or "kickback". The prohibition is general and applies to payments or consideration involving consultants, agents, intermediaries, customers, vendors and government officials.
- 4.10.2. If anyone attempts to offer a bribe or kickback, or solicits a bribe or kickback, or an employee becomes aware of any such attempt or solicitation involving any other employee or consultant, immediately report this to the Managing Director.

4.11. Conflict of interest

- 4.11.1. A conflict of interest arises where an employee has a personal interest that could be seen to have the potential to interfere with his objectivity in performing his/her duties or exercising his/her judgement on behalf of Kaizen Technologies.
- 4.11.2. No Kaizen Technologies employee or contractor may engage in any personal, business or professional activity, nor hold any direct or indirect financial interest in any legal entity or person, that is in competition with Kaizen Technologies or otherwise conflicts with the responsibilities of his or her position at Kaizen Technologies.
- 4.11.3. No employee or consultant may engage in any personal, business or professional activity, nor hold any direct or indirect financial interest, that conflicts with the responsibilities of his or her position.
- 4.11.4. If an employee has a previous business or personal interest, which might conflict with his/her responsibilities, such employee shall inform his/her line manager of said interest at the time of his employment.
- 4.11.5. If a Kaizen Technologies employee wishes to engage in a business opportunity that might conflict with his/her responsibilities, such employee shall inform the Managing Director of such an intention and shall not engage in such activities before he/she receives permission in writing to continue with the activity from the office of the Managing Director. This includes any part time work opportunity or 'moonlighting'.
- 4.11.6. When an employee is involved in a project, negotiations or any other activity in Kaizen Technologies which involves the employee's participation in a decision making process and this participation might be compromised because of a conflicting business interest or the involvement of friends, family or business partners the employee will immediately declare to the meeting or process the potential conflict, and shall not partake in any decision making process.



4.11.7. Employees and contractors should observe the following general principles concerning conflict of interest:

- 4.11.7.1. All decisions made and actions taken by an employee or contractor in the course of their employment or contracting engagements must be made solely on the basis of the best interest of Kaizen Technologies.
- 4.11.7.2. In the area of conflict of interest, appearances count. A good rule of thumb is that a potential conflict of interest exists any time an observer of your actions might question whether they are motivated solely by your responsibilities to Kaizen Technologies.
- 4.11.7.3. If you are not certain whether a conflict of interest exists, proceed as if a conflict definitely exists until you have disclosed and resolved the potential conflict. Before taking any action in which your judgment may appear to be compromised, disclose the potential
- 4.11.7.4. No employee or consultant may directly or indirectly participate in any transaction involving Kaizen Technologies in which he or she has any personal or other financial interest other than of an employment or consultant and/or shareholder of Kaizen Technologies unless the nature and extent of the interest has been fully disclosed to and approved by Kaizen Technologies.
- 4.11.7.5. For example, unless specifically approved by Kaizen Technologies, employees and consultants may not receive finder's fees, commissions or other compensation from a third party for a transaction involving Kaizen Technologies.
- 4.11.7.6. Employees or consultants may not take personal advantage of a business opportunity developed through activities compensated by Kaizen Technologies, or that is otherwise rightfully an opportunity that belongs to Kaizen Technologies.

4.11.8. Avoiding conflict of interest

- 4.11.8.1. In many cases, a potential conflict of interest can be resolved if it is disclosed before actions are taken in which your judgment may be compromised. Disclose any potential conflict before taking any action that may appear to be influenced by the conflict.
- 4.11.8.2. **All employees must get approval from the Managing Director before:**



- 4.11.8.2.1. Securing a direct or indirect passive investment interest with any suppliers, retailer or customer of Kaizen Technologies.
- 4.11.8.2.2. Participating in any salaried activity other than Kaizen Technologies and
- 4.11.8.2.3. Getting involved in any activity, which may result in Kaizen Technologies' information being disclosed.

4.12. Unauthorised use of Kaizen Technologies funds

- 4.12.1. No employee or consultant shall make unauthorised use of Kaizen Technologies' funds, assets, facilities or employees for personal gain.
- 4.12.2. No employee or consultant shall make, condone or cause to be made any payment with the intention or understanding that any part of the payment is to be used for any purpose other than that indicated by the documents supporting the payment.

4.13. Confidentiality

- 4.13.1. Employees and consultants must maintain and ensure the confidentiality of all information concerning the company and/or any customer, supplier or other entity with whom Kaizen Technologies does business or with whom Kaizen Technologies is considering doing business. **Any information that is not in the public domain, is confidential and may not be disclosed** to any third party (third party is defined as any party outside of the company)

4.13.2. Information provided to the company by third parties

- 4.13.2.1. Employees and consultants who possess information are responsible for knowing whether formal restrictions on disclosure of such information exist and shall handle such information in accordance with such restrictions. Examples of confidential and/or proprietary information include:
 - 4.13.2.1.1. Terms and conditions of contracts
 - 4.13.2.1.2. Technical manuals
 - 4.13.2.1.3. Planned or projected transactions or activities
 - 4.13.2.1.4. Performance appraisals
 - 4.13.2.1.5. Software code or functionalities
 - 4.13.2.1.6. Product specifications
 - 4.13.2.1.7. Proposed service plans or changes
 - 4.13.2.1.8. Financial, Profit and pricing information



- 4.13.2.1.9. Methods or systems
- 4.13.2.1.10. Product or service quality information
- 4.13.2.1.11. Designs or capabilities
- 4.13.2.1.12. Employee or supplier lists
- 4.13.2.1.13. Business objectives and strategies
- 4.13.2.1.14. Approvable Descriptions
- 4.13.2.1.15. All the company's policies and procedures
- 4.13.2.2. In public or social groups, employees should avoid conversations about plans, problems, or business unless they are already public knowledge.

4.14. Intellectual property

- 4.14.1. Kaizen Technologies' conditions of employment require the protection of intellectual property.
- 4.14.2. Employees are responsible for maintaining the confidentiality of all such information even if they no longer work for Kaizen Technologies. The company has no interest in the unauthorised use of information developed by or about other organisations and employees and consultants are not permitted to make unauthorised use of such information.

4.15. Computer security

- 4.15.1. Each employee is responsible for the protection and confidentiality of his/her passwords, ID's and any other access information to systems and networks.
- 4.15.2. All security measures and internal controls that have been established for safeguarding the integrity and validity of computer system, data and software must be complied with.

4.16. Spokespersons and the media

- 4.16.1. All communications concerning Kaizen Technologies with any representative of the media or the financial community (including reporters, journalists, commentators, authors, investors, traders and analysts) must be authorized by Kaizen Technologies' Managing Director or his/her designate.
- 4.16.2. Only a company approved spokesperson has the right to respond in public on issues in relation to Kaizen Technologies' business. **If an employee is contacted by any representative of the media or financial community with an inquiry relating to the company: he/she should**
 - 4.16.2.1. Not respond or otherwise offer comment
 - 4.16.2.2. Refer that person to the Public Affairs Division



- 4.16.2.3. If uncertain about how to contact the Managing Director, advise reporter or other media or financial community representative that he will contact them.
- 4.16.2.4. Always note the name, organisation and telephone number of anyone from the media or financial community.
- 4.16.2.5. Resist any pressure to “just give a quick answer” or to “give your personal opinion” on a Kaizen Technologies matter.

4.17. Political contributions and support

- 4.17.1. No employee or consultant is permitted to make a political contribution in the form of funds, property, services or other assets belonging to Kaizen Technologies.
- 4.17.2. Kaizen Technologies respects the rights of its employees to participate in the political process. When pursuing such activities, employees must ensure that their views are not identified as those of Kaizen Technologies. Where employees' political interests interfere in any way with their duties or loyalty to Kaizen Technologies, this should be discussed immediately with the persons to whom they report.

4.18. Harassment

- 4.18.1. Kaizen Technologies requires that its employees act and be treated with dignity and respect. Kaizen Technologies does not tolerate any form of sexual, racial, ethnic, religious or other harassment by any employee, manager, or executive or by any customer, vendor or member of the public.
- 4.18.2. Kaizen Technologies will not tolerate inappropriate verbal or physical conduct on the part of any employee that disrupts or interferes with another employee's work performance or in any way creates an intimidating, offensive or hostile work environment. This includes conduct based on the other employee's race, colour, creed, religion, ancestry, national origin, age, status, and political affiliation or by reason of the employee being a disabled person.
- 4.18.3. Kaizen Technologies does not tolerate any form of sexual, racial, ethnic, religious or other harassment of any employee by another employee by Kaizen Technologies line manager, manager or executive or by any customer, vendor or member of the public.

4.19. Relationships with the suppliers

- 4.19.1. The suppliers should be selected only after an impartial and objective determination that the supplier is best able to meet Kaizen Technologies' needs.



- 4.19.2. Business and personal activities must be kept separate. Having both a personal and a business involvement with a supplier or potential supplier may create conflict of interest.
- 4.19.3. Purchases by Kaizen Technologies must be based upon quality performance and Kaizen Technologies procurement policy. The purchase of products and services by Kaizen Technologies must always be free from even the perception that:
 - 4.19.3.1. Favourable treatment may have been sought received or given on the basis of Kaizen Technologies employees or consultant receiving gifts, meals, entertainment or any consideration of value from an actual or potential supplier; or
 - 4.19.3.2. An actual or potential conflict of interests may influence the decision.
- 4.19.4. The suppliers should be selected only after an impartial and objective determination that the supplier is best able to meet Kaizen Technologies' needs.
- 4.19.5. Factors entering into any such purchase decision include the business reputation, BBBEE profile, financial strength, the price, quality and dependability of the goods or services to be supplied and the service record of the supplier and the nature of the guarantee and warranty of the goods and services.
- 4.19.6. Additional preference may be given to the following types of suppliers, providing such preference involves no material sacrifice in value to Kaizen Technologies:
 - 4.19.6.1. Suppliers qualifying under Kaizen Technologies supplier development strategy
 - 4.19.6.2. Suppliers who are developing new and improved products or equipment, or designing and developing a special product for Kaizen Technologies' exclusive use.
- 4.19.7. No bribes or kickbacks are allowed as a result of selection of a supplier. Failure by suppliers to adhere to the principles must be brought to the appropriate manager's attention.

4.20. Non-retaliation

- 4.20.1. Kaizen Technologies prohibits any employee, line manager, executive or manager from retaliating against an employee or consultant for reporting a concern.
- 4.20.2. No manager, line manager or employee is permitted, directly or indirectly to:
 - 4.20.2.1. Retaliate;
 - 4.20.2.2. Threaten to retaliate; or
 - 4.20.2.3. Encourage others to retaliate.



5. RELATIONS WITH THE COMMUNITY DEVELOPMENT

- 5.1. Kaizen Technologies will conform to legislation, regulations and charters, including (but not limited to) the Companies Act, safety/health/environment laws, BBBEE and King IV Code of Corporate Governance (as applicable)
- 5.2. Kaizen Technologies will support communities in which it operates. Donations and educational and cultural contributions will be made in terms of its community and social investment budget.

6. THE ENVIRONMENT

- 6.1. Kaizen Technologies is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly.
- 6.2. Kaizen Technologies aims to limit the use of finite resources in all business ventures and in particular recognises its role in managing natural resources responsibly, waste management and usage of energy.

7. POLICY REVIEW

- 7.1. The policy should undergo a planned review at least annually or whenever a need arises.

8. COMPLIANCE AND VERIFICATION

- 8.1. Kaizen Technologies aims to create the climate and opportunity for our employees to voice genuine concerns about behaviours or decisions that they perceive to be unethical.
- 8.2. In the event that any employee has any concern about the Company's, or fellow employee's activities are in breach of this Code of Conduct, they may approach their respective Director, or they may choose to speak to a Company partner, being the Talent Manager and make it known that they require the confidentiality associated with being a whistle-blower
- 8.3. Any failure by any employee to report any breach of this Code can lead to disciplinary action.

END.