



Ethics Policy

GCR_HRM 001

Version 3.0 December 2020





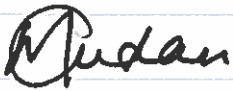
| Version Control and Approval | |
|---|---|
| Document Name | Ethics Policy |
| Document Number/Version | 3.0 |
| Implementation | |
| Implementation Date | 2021/22 Financial Year |
| Approval | |
| Date Approved | June 2021 |
| Related Documents | Gifts Acceptance Policy, Ethics Policy, Code of Conduct, Whistle Blowing Policy |
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STATEMENT OF INTEGRITY

As our vision and mission statement states, SASSETA is a leader in skills development for the Safety and Security Education and Training Authority that ensures quality provision of skills development and qualifications for South African citizens in the safety and security environment. This is delivered through effective and efficient partnerships. Thus, our reputation as a partner in skills development depends on the integrity presented when conducting all our daily business dealings and transactions by all our employees and representatives ranging from executive to junior staff.

Our statement of integrity is built on an implicit set of values that inspire SASSETA employees and representatives to maintain the highest ethical standards in all their dealings with our clients and stakeholders, as well as their relationships within the organisation.

SASSETA's Ethics Policy has the full support of its Accounting Authority, Chief Executive Officer, Management, staff members and all representatives. The Ethics Policy reflects on our personal integrity, honesty, respect for human dignity, equal opportunity and the rights of others. It reflects our commitment to what is right, fair, reasonable, legal and just.

SASSETA's ETHICS POLICY

The SASSETA Ethics Policy has been put in place to ensure that its members understand and carry out its objectives which represent commitment to a fair, transparency, honesty, impartiality, credibility, integrity and accountability when conducting all its business affairs, both with internal staff and external stakeholders. This commitment is based on a fundamental belief in carrying out fair, honest and legal conduct in all business activities. All employees and representatives, irrespective of position, are expected to share this commitment in high moral, ethical and legal standards.

1. PURPOSE

The purpose of the Ethics Policy is to outline and ensure availability of guidelines that emphasises and speak of proper conduct for all members of the organisation, its representatives and stakeholders. It is therefore formulated to lay down a strict ethical code with which all members of SASSETA and its representatives are required to comply. Failure to comply with the SASSETA Ethics Policy will amount to misconduct and will be dealt with in terms of SASSETA's Disciplinary Code.

2. SCOPE

This Policy applies equally to all employees and other representatives of the organisation. Compliance to this Policy by all employees and representatives is, therefore, mandatory.

3. ETHICS AND VALUES

Ethics involve the ability to distinguish right from wrong and a commitment to do what is right. Values are core beliefs which create individual attitudes. Although individual values may differ, this does not imply a choice about behaving ethically in the business environment of SASSETA.

4. ETHICAL CONDUCT

Ethical conduct refers to standards of conduct or the ways in which we should behave, based on our moral values that arise from principles about what is right and wrong in our business environment.

Ethical conduct is fostered and maintained when individual employees act with integrity, honesty and in good faith in all their business dealings in relation to SASSETA's cultural way of doing business. It is reflected in behaviour that adheres to this policy, adopts its principles and follows its guidelines.

Furthermore, SASSETA is of the view that having strong ethical values and consistently displaying them in all of our activities, will derive added benefits, such as:

- Improved business management;
- Increased productivity;
- Avoidance of litigation;
- An enhanced organisation image that attracts and retains talent;
- Earning the public and stakeholder's goodwill/confidence; and
- Being a sound corporate citizen and public entity.

5. ETHICAL BEHAVIOUR

Ethical behaviour refers to actions by a SASSETA employee or representative, which are intended to further the common good of the organisation, as determined by its policies, procedures, directives and business objectives. Collective ethical behaviour is that which is perceived by SASSETA's external clients and stakeholders about its commitment to the common good based on the actions of its employees.

6. ETHICS ON THE JOB

This section describes responsibilities for protecting confidential information and assets and the need for fair and honest reporting of information internally, and external to, the organisation.

6.1. Confidential Information

During the course of work, employees may have access to confidential information, including business plans, current and potential litigations, financial information, personnel and salary information, etc. Unauthorised disclosure of confidential information outside and inside SASSETA, especially to competitors, could be harmful to the organisation. Consequently, confidential information should be used only for the purpose for which it was intended. Respecting the confidentiality of corporate or personal information is an absolute requirement that each employee should comply with, without any exception.

Confidential information should preferably – where only available in hard copy format – be kept in locked files and storage areas and should eventually properly and responsibly be disposed of.

SASSETA staff and representative shall be required to do their outmost best to secure the SETA's confidential information in the event that they are requested to work from remote locations as measures to curb the spread of communicable diseases, outbreak investigations, temporary or permanent loss or SASSETA premises or any other emergency or crisis determined by SASSETA Management.

6.2. Intellectual Property Rights

Confidential information includes SASSETA research and development activities, product development and any other intellectual property belonging to the SETA. The disclosure of information outside the SASSETA will only be permitted if it is done by authorised personnel with Management's written approval.

6.3. Compliance with Legislation

SASSETA is required by legislation – such as, but not limited to, the Public Finance Management Act (PFMA) – to provide truthful information on its employment conduct, financial reports and any other information required by law. Thus, no false or misleading entries should be made in any books or records of SASSETA for any reason.

6.4. Asset Protection (This clause includes physical assets and the organisational funds)
SASSETA employees must at all times ensure that the SETA's assets are used only for legitimate organisational business purposes. Where an employee's position requires organisational funds to be spent, it is the individual's responsibility to use good judgement on behalf of the organisation and to ensure that tangible output is received by the organisation for such expenditures.

In terms of Section 57 of the PFMA, each employee, within the area of his/her responsibility, is responsible for the managing of the organisation's liabilities and for the safeguarding of its assets. Every employee will thus be held accountable for the care and safe custody of the organisation's assets (including Intellectual Property rights) placed under such employee's control.

6.5. Conflicts of Interest

The organisation expects employees not to use their position or knowledge gained through their position within SASSETA for private and/or personal gain or to conduct business in such a manner that may present an actual or perceived conflict between the organisation's interest and any employee's personal interest.

A conflict of interest exists when an employee has a personal interest that could interfere with his/her objectivity in performing his/her duties as a SASSETA employee. For instance, a potential conflict could occur where an employee, a member of an employee's family or a business with which the employee or family is associated, obtains a gain, advantage or profit by virtue of the employee's position with the organisation or information gained through the employee using that position.

Employees should therefore avoid any real or perceived conflict of interest with SASSETA as their employer.

Conflicts of interest also include:

- External work for clients, suppliers, vendors or competitors;
- Accepting an assignment for personal gain, the nature of which is similar to the work being done for SASSETA;
- Holding a financial interest, such as a shareholding or a commission for placing business, in a business concern that is a supplier or client of SASSETA, or related clients;

- Financial or personal involvement with an employee or representative of a supplier, vendor, client or competitor of SASSETA, with whom SASSETA employee regularly comes into contact while performing SASSETA business;
- Accepting exclusive or preferential discounts from an employee or representative of a supplier or client;
- Dealing directly with or through a spouse or family member who is a supplier, vendor, client or competitor, or is employed by one;
- Soliciting loans from clients or suppliers who are not generally in the business of granting loans to the public; and
- Purchasing shares from a supplier on a preferential basis.

6.6 Conducting Business with the State

- Employees, political office-bearers (POB), special advisors and members of the Board and its sub-committees of SASSETA are expressly prohibited from conducting business with the state.
- Whilst doing business with the state is prohibited, in the event that an employee, political office-bearers (POB), special advisor or members of the Board or its sub-committees of SASSETA, who intend to engage in business transactions with state entities for remuneration, permission would have to be sought from Executive Management and final approval from the Chief Executive Officer. The Board and its sub-committee members would require permission from the Department of Higher Education, Science and Technology.
- Employees, political office-bearers (POB), special advisors and members of the SASSETA Board and its sub-committees who are currently conducting business with the state and/or private sector or are directors of a company that conducts business with the state and/or private sector, must make a full disclosure within one month and cease conducting business with the state, resign as a director of a company that conducts business with the state within six months or resign from SASSETA.

7. EMPLOYEE ACCOUNTABILITY

7.1. Bribes and kickbacks

In the South African law, bribery is defined as “the giving, agreeing to give or offering to give, any reward or consideration in return for future or past action, in the course of an employee’s official duties.” The employee who receives or agrees to receive the reward or consideration, also commits bribery and contravenes the Corruption Act.

No bribes or kickbacks of any type may be paid to or accepted by any employee. Paying or receiving a bribe constitutes criminal behaviour; and will be prosecuted to the full extent of the law.

7.2. Solicitation of payments, gifts or loans

Employees may not use their position at SASSETA to solicit any form of favour, payment, overseas travel, gifts or loans from suppliers or other stakeholders. Solicitation places the supplier or stakeholder in a position where he or she feels obliged to provide the favour or gift to avoid losing SASSETA business or receiving poor service. These practices are strictly forbidden.

8. SUMMARY OF GUIDELINES FOR ETHICAL CONDUCT

- 8.1.** Perform your duties with honesty, integrity and to the best of your ability.
- 8.2.** Communicate openly and honestly; and demonstrate a sense of purpose and a commitment to achieving the optimum outcome, even under adverse conditions.
- 8.3.** Accept accountability for your actions and decisions.
- 8.4.** Behave in a way that is beyond reproach.
- 8.5.** At all times, comply with the policies, procedures and guidelines of the SASSETA and the manner in which it conducts its business.
- 8.6.** Use information obtained from SASSETA's work environment or resulting from your position as an employee of the organisation, only for the purpose for which it is intended, i.e. for the good of the organisation.
- 8.7.** Treat the assets and property of the SASSETA, its employees, its clients and stakeholders and its suppliers with the same respect as you would your own.
- 8.8.** Do not waste the SASSETA's resources, including time.
- 8.9.** Declare in writing, any information you may have about a personal or corporate conflict of interest.
- 8.10.** Refuse any gifts that could be regarded as an attempt to exert undue influence over you to the detriment of the organisation.
- 8.11.** Challenge others that you notice acting in an unethical way, report behaviour in conflict with the Code of Conduct and Ethics Policy and do not tolerate any form of retribution against those who speak up.

9. POINTS TO CONSIDER

Employees should consider the following questions to themselves when any behaviour is questionable:

- 9.1. Is the behaviour legal?
- 9.2. Does the behaviour comply with all SASSETA policies?
- 9.3. Does the behaviour reflect SASSETA values?
- 9.4. Could the behaviour adversely affect SASSETA's stakeholders?
- 9.5. Would you feel personally concerned if the behaviour appeared in a news headline?
- 9.6. Could the behaviour adversely affect SASSETA if all employees did it?

10. REPORTING OF SUSPECTED UNETHICAL BEHAVIOUR

In order for SASSETA to maintain high ethical standards, it is the duty of every SASSETA employee and representative to take due care in the way they conduct themselves and to report any concerns of perceived unethical behaviour, such that an investigation can be conducted to confirm or refute allegations, which would enable SASSETA to take appropriate corrective action.

In the first instance, employees should raise any concerns they have in this regard with their immediate superior. Where an employee is not satisfied with the response, they should notify the Statutory Reporting, Governance, Risk and Compliance Manager who will treat all such notifications in utmost confidence and be responsible for addressing any issues raised.

In instances where the employee fears victimisation or wishes to remain anonymous, the employee may direct his/ her concerns to Public Service Commission's (PSC) anti-corruption hotline by calling: 0800 701 701 or the DHET Fraud Hotline: 0800 87 22 22.

11. CONTRAVENTION OF THE CODE OF CONDUCT / ETHICS

Non-adherence to the policy and guidelines of the SASSETA Code of Ethics or transgression of the Ethics Policy will result in disciplinary action being taken.

However, should an employee be in doubt about the application of this policy, he/she must discuss the matter with his/her immediate superior or the Human Resources Department representative.

12 POLICY REVIEW

This Policy shall be reviewed every two years or when Management or any relevant governance structure deems it fit for continuous control and monitoring of the regulatory

environment for possible amendments and recommendation to the Accounting Authority / Board for approval.