

SAICA GROUP

Employee Code of Conduct

Document control

Managed by	Risk & Compliance
Code of Conduct Owner	Senior Executive: Risk & Compliance
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Code of Conduct Sponsor (if different from owner)	Executive Director: Governance
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1. Introduction & Purpose

- 1.1. Employees', acting on behalf of SAICA, behaviour underlies all SAICA business relationships, including relationships with its members, service providers, suppliers, the public, and work environment relationships between employees. As a result, the highest standards of ethical business conduct are required from employees in fulfilling their duties and responsibilities towards SAICA. SAICA as a non-profit organisation has an obligation to act in the public interest and SAICA therefore requires that all employees' standards of ethical behaviour also promote and maintain public interest.
- 1.2. The objective of this Employee Code of Conduct (Code of Conduct) is to set out SAICA's expectations regarding its employees' behaviour towards SAICA, their colleagues, management and the overall SAICA Group.
- 1.3. The Code should be read and interpreted together with SAICA's Employee Code of Ethics ("Code of Ethics"), other related codes of conduct, and policies and procedures.
- 1.4. This Code of Conduct aims to:
 - 1.4.1. provide a behavioural direction and guidance to SAICA employees; and
 - 1.4.2. assist in the formation, maintenance and enhancement of an ethical culture within SAICA.

2. Scope & Application

- 2.1. This Code of Conduct applies to SAICA and its business activities and operations. This Code of Conduct applies to all SAICA employees, and service providers and other stakeholders who have adopted this Code of Conduct or the principles thereof via a contractual agreement or otherwise, irrespective of whether an offence has actually been committed or where there is only a suspicion of an offence being committed.
- 2.2. This Code of Conduct shall also apply to SAICA's Controlled Entities and its employees' to the extent that such entities have a similar code/policy in place.

- 2.3. This Code of Conduct does not replace employees' conditions of employment and the Disciplinary Code or any other related code of conduct, but rather compliments the conditions of employment and reflects SAICA commitment to its adoption of the core values and ethical standards.

3. Code of Conduct Statements

- 3.1. Because SAICA expects the highest standards of ethical business conduct from its employees in fulfilling their duties and responsibilities towards SAICA, it has adopted the following conduct statements:

- 3.1.1. **Conduct Statement 1:** SAICA expects all employees to share in its commitment to high ethical, moral and legal standards and aims to create opportunities and wherein employees may voice their genuine concerns about employee behaviours and decisions, or anything unethical or perceived as unethical. Employees are required to act and perform their duties in accordance to SAICA ethical aspects and SAICA's six core values, as set out in the **Code of Ethics**, being:

3.1.1.1. **Integrity:** 'Demonstrating sound moral and ethical principles in everything we do';

3.1.1.2. **Accountability:** 'Accepting full responsibility for the outcomes of your actions';

3.1.1.3. **Professional Behaviour:** 'Abiding by laws, regulations and policies and refraining from any conduct that would bring SAICA and the profession into disrepute';

3.1.1.4. **Respect:** 'Holding SAICA and each other in high regard';

3.1.1.5. **Transparency:** 'Encouraging an open and honest environment'; and

3.1.1.6. **Member Centricity:** 'Ensuring a positive member experience by striving to exceed expectations'.

- 3.1.2. **Conduct Statement 2:** Employees must behave and conduct themselves in such a manner that is in accordance to the principles of this Code, the Code of Ethics and other related policies and codes of conduct, in all instances where an employee is linked to SAICA or could be linked to SAICA.

- 3.1.3. **Conduct Statement 3:** Employees must show integrity and professionalism in all instances where an employee is linked to SAICA or could be linked to SAICA.

- 3.1.4. **Conduct Statement 4:** SAICA promotes freedom of expression, and transparent and open communication. Employees are expected to foster a friendly, respectful, mutual trust, well-organised and collaborative work environment. Employees shall avoid offending, participating in serious disputes and disrupting the SAICA work environment or present obstacles to their colleagues' work.

- 3.1.5. **Conduct Statement 5:** Employees should carry out their day-to-day duties and activities as to ensure adherence to the compliance obligations that are applicable to their area of responsibility, as set out in the **Compliance Policy and Manual**.

- 3.1.6. **Conduct Statement 6:** SAICA has a zero tolerance against improper influence, bribery, corruption, fraud and other unethical conduct, as set out in the **Fraud Prevention Policy and Conflict of Interest and Gift Policy**.

- 3.1.7. **Conduct Statement 7:** Employees shall avoid any personal, financial or other conflicts of interests that might hinder their capability or willingness to perform their duties and not using use their position for private gain or to improperly benefit herself/himself or another person, as per the **Conflict of Interest and Gift Policy**.
- 3.1.8. **Conduct Statement 8:** Employees should respect their colleagues and no discriminatory behavior, harassment or victimisation (in any form) shall be tolerated. Employees should conform to SAICA's employment equality principles and standards in all aspects of their work, from recruitment, promotion, performance evaluation and interpersonal relations. Refer to the **Recruitment and Selection Policy and Internal Promotion and Transfer Policy**.
- 3.1.9. **Conduct Statement 9:** Employees shall not engage in any activity which may raise concerns or questions in regards to SAICA's integrity, equality, impartiality, respect for diversity or reputation.
- 3.1.10. **Conduct Statement 10:** Employees shall not misuse, abuse or frivolously use SAICA property, and shall protect SAICA's property from damage and vandalism, whenever possible.
- 3.1.11. **Conduct Statement 11:** Employees shall adhere to and ensure compliance with the procurement and contract processes. Refer to the **Procurement Policy and Framework and the Contract Management Policy and Framework**.
- 3.1.12. **Conduct Statement 12:** Employees shall not abuse their employment benefits.
- 3.1.13. **Conduct Statement 13:** Employees must follow SAICA's dress code and other personal appearance guidelines. Refer to the **Dress Code Policy and Procedure**.
- 3.1.14. **Conduct Statement 14:** Employees shall fulfill their job duties with honesty, integrity and respect toward their colleagues, SAICA's members, clients, service providers, suppliers, all other stakeholders, and the public in general. Employees, more specifically Managers, shall not abuse their authority and only delegate authority in accordance to the **Delegation of Authority**. Employees are expected to follow their Manager's instructions and complete their duties with the required due care, diligence, skill and in a timely manner.
- 3.1.15. **Conduct Statement 15:** Employees shall be punctual and follow their working hour schedules, subject to agreed flexible work hours or alternative arrangement with their direct Manager. Refer to the **Flexible Hours Policy**.
- 3.1.16. **Conduct Statement 16:** Employees shall meet their agreed outputs within the agreed deadlines. Refer to the **Performance Management Policy**.
- 3.1.17. **Conduct Statement 17:** Employees shall promote SAICA's principles and standards in regards to a healthy, safe and environmentally friendly working environment and not engage in any activity which may negatively affect the health and safety of SAICA employees or other stakeholders visiting SAICA premises or the environment. Refer to the **Occupational Health, Safety and Environment Policy, Disability and Ill Health Policy, Grievance Policy and Procedure and Sexual Harassment Policy**.
- 3.1.18. **Conduct Statement 18:** Employees shall promote SAICA's principles and standards in regards to information security and protection (including personal information) and not engage in any activity which may negatively affect information security and protection. Refer to the **General Data Protection and Retention Policy, Privacy Policy** and other related policies.

- 3.1.19. **Conduct Statement 19:** Employees shall read and follow SAICA's policies and procedures, as well as any communication in regards to updates or amendments to such policies and procedures. Employees shall also attend training sessions and undergo assessments, as determined by the Code of Conduct Owner in conjunction with his/her Manager.
- 3.1.20. **Conduct Statement 20:** Employees shall ensure that the quality standards, as determined by SAICA, in terms of its services and products are maintained and enhanced (e.g. quality standards based on King IV, ISO-standards and Marketing Branding Standards).
- 3.1.21. **Conduct Statement 21:** Employees shall take responsibility and accept accountability for actions and decisions taken in accordance to performing its duties and responsibilities.
- 3.1.22. **Conduct Statement 22:** Employees shall honour confidentiality of all matters, documents, information, intellectual property and discussions regarding SAICA and not use or disclose any official, restricted, proprietary or sensitive information, without SAICA's authorisation and/or for personal gain or gain of others. Refer to the **Data Governance Policy and Documented Information Guideline**.
- 3.1.23. **Conduct Statement 23:** SAICA, as an employer, has a responsibility to correct unacceptable or unsatisfactory behaviour or conduct of an employee and its aim in regards to disciplinary action is to correct the unacceptable or unsatisfactory behaviour or conduct of an employee. Disciplinary action shall be appropriate in relation to the seriousness of the contravention of the employee. Each contravention of an employee will be dealt with on an individual basis, subject to the specific circumstances and due consideration of the record of the specific employee. Refer to the **Disciplinary Policy and Code, and Procedure**.

4. Roles & Responsibilities

- 4.1. Management should ensure that all SAICA employees, and all relevant service providers and stakeholders are familiar with the content of this Code of Conduct and the relevant regulatory requirements, as well as subsequent amendments thereto from time to time.
- 4.2. Employees are personally responsible for ensuring that their conduct is ethical. Employees shall adopt, adhere, uphold, promote, enforce and have conceptual knowledge of the content of this Code of Conduct, including the necessary skill to apply, practice and resolve to implement this Code of Conduct.
- 4.3. The Risk and Compliance Department, Governance shall enforce this Code of Conduct and ensure that all SAICA employees understand their responsibilities in terms of this Code of Conduct.

5. Reporting

- 5.1. This Code of Conduct imposes a duty and responsibility on employees to report non-compliance of this Code of Conduct to the Code of Conduct Owner. Alternatively, must report such via SAICA's Anonymous Tip-off Hotline. Please refer to the Whistleblowing Process for guidance on how to report.

5.2. In turn, the Code of Conduct Owner shall report non-compliance of this Code of Conduct to the Compliance Function on a monthly basis and provide continuous status updates on the reported non-compliance.

6. Remedial Action

It should be noted that should an employee fail to adhere to this Code of Conduct, such conduct may result in disciplinary action or legal action being taken in accordance to SAICA's Disciplinary Code, Disciplinary Procedure, and other relevant legal procedures.

7. Approval & Effective Date

This Code of Conduct shall be approved by ExCo and shall come into effect 1 (one) month after approval by ExCo, subject to the completion of implementation and the necessary training awareness created by the Code of Conduct Owner.

8. Review of Code of Conduct

8.1. This Code of Conduct will be reviewed every 3 (three) years or as required, in order to ensure that the terms are current, fair and representative of relevant corporate and industry conditions.

8.2. SAICA reserves the right to change this Code of Conduct at any time, without prior notice and will communicate such changes to all affected.

CODE SIGN-OFF AND OWNERSHIP DETAILS

Code Title	Employee Code of Conduct
Publication Date	
Review Date	31 October 2020
Related Legislation Applicable	n/a
Related Policies, Procedures, Guidelines, Standards, Frameworks	SAICA's Constitution; SAICA's By-laws; SAICA's Delegation of Authority; King IV Report; Employee Code of Ethics; Conflict of Interest & Gift Policy; Fraud Prevention Policy; Procurement Policy; Disciplinary Code; Occupational Health, Safety and Environment Policy; General Data Protection and Retention Policy; Privacy Policy; Data Governance Policy and Documented Information Guideline; Grievance Policy and Procedure; Sexual Harassment Policy; Disability and Ill Health Policy; Dress Code Policy and Procedure; Contract Management Policy.
Replaces	SAICA Values (2005)

Code Owner	Senior Executive: Risk & Compliance
Code Owner (Tel)	011 621 6645
Code Sponsor (if different from Code Owner)	Executive Director: Governance
Application	SAICA, Internal and External stakeholders
Functional Owners	Risk & Compliance
Status	Draft
Final Approval by	Management Executive Committee
Approval Date	
Version	1.0

Sign-off:

The following party is a signatory to the content of this Code:

Signed by the Chairman of the ExCo

Chairman of the ExCo

Date: 26 May 2020

Revision History

Version	Date	Revision Description & Summary of Changes (for audit trail purposes) Note: The Change Risk Management process must be followed where significant changes are made to this Code.	Code Owner & Code Sponsor
[2.0]	[DD:MM:YY]	Major Revision: Legislative amendment (Approval required)	-
[1.1]	[DD:MM:YY]	Minor Amendments: formatting	-
1.0	[DD:MM:YY]	First draft: new code	Nasiegh Hamdulay – Senior Executive: Risk & Compliance & Jaco Snyman – Executive Director: Governance

End of Code