



UMGENI WATER

CHIEF EXECUTIVE
CODE OF ETHICAL CONDUCT

CE/POL/1.2.3
Rev.: 3

CODE OF ETHICAL CONDUCT

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1. PURPOSE OF THE CODE

The purpose of this Code of Ethical Conduct is to:

- 1.1 establish a set of principles that would promote and encourage ethical behavior and decision making by all employees, board members and stakeholders;
- 1.2 promote good governance by setting ethical objectives and milestones and ensuring that such objectives are integrated in broader Umgeni Water’s strategic objectives;
- 1.3 ensure that ethics are clearly communicated and understood as an integral part of Umgeni Water’s corporate identity, culture and purpose;
- 1.4 ensure that ethics informs Umgeni Water’s policies, procedures, practices, conduct and business processes, and to ensure that all decisions are preceded by deliberation on ethical issues;
- 1.5 ensure that decisions and actions are based on ethical values underpinning good corporate governance, namely, responsibility, accountability, fairness and transparency; and
- 1.5 communicate a clear message that failure to meet ethical objectives could undermine the pursuit of other broader Umgeni Water objectives, and will not be tolerated. Conduct contrary to ethical standards espoused herein could result in disciplinary action being taken.

2. APPLICABLE LEGISLATION, CODES AND REGULATIONS

Legislations, Codes of Good Practice and/or policy documents applicable to these Terms of Reference shall include, but not limited to the following:

- 2.1 Public Finance Management Act, No. 1 of 1999 (hereinafter “the PFMA”);
- 2.2 Public Services Act, No. 104 of 1994, only to the extent that this Act regulates fraud prevention and combating of corrupt activities, since the Act itself is not binding on Umgeni Water;
- 2.3 Companies Act, No. 71 of 2008;
- 2.4 Prevention and Combating of Corrupt Activities Act, No. 12 of 2004;
- 2.5 Protected Disclosures Act, No 26 of 2000;
- 2.6 Competition Act, No. 89 of 1998;
- 2.7 National Environmental Management Act No.59 of 2008
- 2.8 King Report on Corporate Governance, 2016
- 2.9 The OECD recommendations regarding corruption;
- 2.10 United Nations Global Compact Principles;
- 2.11 International Labour Organization Protocol on Decent Work and Working Conditions;

2.12 Protocol on Corporate Governance in the Public Sector;

2.1.3 Public Audit Act (No. 25 of 2004) as amended (Act, No. 5 of 2018)

2.1.4 Any reference to legislation, codes of good practice or policy documents in this clause 2, shall include regulations issued in terms thereof as well amendments thereto promulgated or implemented from time to time.

3. SCOPE AND APPLICATION OF THE CODE

3.1 This Code is applicable to all employees, directors and stakeholders (to the extent relevant) uniformly and without exception. Failure to follow this Code could result in disciplinary action being taken.

3.2 It is acknowledged that a detailed rules-based code of ethics removes all individual discretion and results in mechanistic decision making even in instances where wisdom and good counsel would have been more appropriate. This Code is largely based on principles more than detailed rules and where necessary reference is made to other Umgeni Water's policies and procedures that regulate specific conduct or issues. All policies referred to herein are incorporated and forms part of this Code.

3.3 The Code is intended to prevent unethical behavior, and to promote and encourage ethical behaviour, and therefore whilst in some instances it contains strict rules that must be adhered with, it mainly provides principles and guidelines on how one should conduct oneself when faced with different circumstances.

3.4 Although administratively the management of this Code falls within the competence of the Ethics Committee which reports to the Audit Committee, the



Board of Directors is ultimately accountable for ensuring and setting the highest ethical conduct in Umgeni Water.

4. PERSONAL INTEGRITY

Employees/Directors should:

- 4.1 take personal responsibility for their actions and they should comply with legal obligations, policies and procedures that are binding on Umgeni Water. This means that every employee/director whose work is directly affected by particular laws must understand the legal rules well enough to identify problems and know when to get advice. Employees/directors are advised to contact the Legal Department or Company Secretary about legal obligations that may affect their roles.
- 4.2 voice concerns when they believe that the law, policies and procedures are not being observed;
- 4.3 report potential or actual misconduct. Examples of misconduct may include, but not limited to fraud, theft, workplace violence, discrimination, harassment (sexual or otherwise), misuse of company resources, conflicts of interest, information breaches, improper accounting controls, procurement malpractice and other unethical behaviors. Employees/directors who report potential or actual misconduct are protected against victimization or retaliation in terms of relevant policies and applicable legislation.

4.4 in circumstances where they feel uncomfortable reporting through established internal channels, report potential or actual misconduct through Umgeni Water’s Hotline on 0800 864 463.

Guidelines:

<u>DO</u>	<u>DON'T</u>
<ul style="list-style-type: none"> • Take personal responsibility for performing assignments consistently with applicable laws, policies and procedures • Know the applicable laws, policies and procedures. When you are not sure, seek guidance from the Legal Department or Company Secretary about laws, policies and procedures relating to your work 	<ul style="list-style-type: none"> • Assume it’s acceptable to follow instructions that violates the law or Umgeni Water’s policies and procedures • Assume someone else will correct a problem. • Assume that a questionable practice is legal just because it has been done by someone else

5. INTEGRITY IN THE WORKPLACE

Umgeni Water shall:

- 5.1 hire, promote, train and pay based on merit, experience or other criteria, such as employment equity requirements set in terms of Employment Equity Act, 1998. These aspects are more fully regulated by, *inter alia*, [Recruitment and Selection Policy](#), [Training and Development Policy](#), [Performance Management Policy](#), [Assisted Education Policy](#), [Succession, Mentoring and Coaching Policy](#);
- 5.2 value the wide range of backgrounds in its workforce and shall strive to create work environment that accepts and tolerate differences while promoting productivity and teamwork;
- 5.3 respect the dignity of all its employees and encourage them to grow as unique contributors to their teams;

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- 5.4 commit to team-based behavior and eradication of unfair discriminatory practices on the basis of age, race, colour, sex, sexual orientation, religion, ethnicity, disability, health status or any other basis;
- 5.5 ensure that employees work in an environment free from conduct that appears disrespectful. To this end, certain jokes, cartoons, pictures, language, gestures and touching may offend people and may result in a hostile work environment which Umgeni Water does not tolerate;
- 5.6 protect the health and safety of each employee and shall strive for a healthy, injury-free work environment that protects the health and safety of each employee. In this regard, all employees are required to follow procedures that are aimed at preventing or reducing accidents and no exceptions or shortcuts shall be tolerated. If there are any safety concerns employees should promptly report them to their immediate superiors so that the situation could be corrected without endangering people's lives;
- 5.7 encourage its employees to continue safe practices outside work, such as following safe driving practices, wearing seatbelt, avoiding the use of cell phones while driving, practicing protected sex, etc;
- 5.8 manage its business in a way that strikes the balance between economic, social and environmental needs;
- 5.9 reduce the business impact of HIV/AIDS, implement an effective HIV/AIDS response programme and ensure accessible, safe, effective and sustainable provision of antiretroviral treatment for eligible employees. This aspect is more



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fully regulated by the HIV/AIDS Policy to which all employees must familiarize themselves.


Guidelines:

<u>DO</u>	<u>DON'T</u>
<ul style="list-style-type: none">• Always treat fellow employees with dignity and respect• Always observe safety protocols• Base personnel decisions on fairness	<ul style="list-style-type: none">• Demean any person or group• Tolerate behaviour that fails to meet Umgeni Water's standards of fairness or respect• Take shortcuts that expose anyone to a risk of injury• Assume someone else has responsibility to identify or correct problems

6. CONFLICTS OF INTEREST

Employees/directors have a duty to:

- 6.1 act in the best interests of Umgeni Water and to provide Umgeni Water with their individual loyalty;
- 6.2 avoid any activity, investment or interest that might be perceived or actually be in conflict with Umgeni Water's interests, excluding publicly commercially available interests (e.g. public promotions, public investments, etc). Examples of potential conflicts of interest include, but not limited to investing in a supplier, having close family members who work for suppliers or customers, employment outside Umgeni Water, etc. In case of uncertainty on whether a conflict of interests exists, employees/directors should consult the Legal Department or Company Secretary for clarity.
- 6.3 annually declare actual or potential conflict of interests in writing. This duty is an ongoing one and employees/directors must ensure that they disclose any change of circumstances covered in earlier declaration/s within 30 days of such change

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occurring. The existence of an actual or potential conflicting interest of an employee should only be approved if it is declared in writing, the conflicting interest could be responsibly managed without prejudice to Umgeni Water, it is not of an enduring nature and it is not in conflict with a material Umgeni Water's interest;

- 6.4 ensure that Umgeni Water does not receive any advantage or disadvantage because of personal relationships they have with third parties. Where an employee/director foresee the possibility of such advantage or disadvantage resulting, there must be

prompt disclosure in order that measures are taken to prevent such eventuality;

6.5 ensure that former employees/directors do not influence or are not perceived to be unduly influencing any decision making process within Umgeni Water;

6.6 dedicate full time (with the exception of directors) to their work during regular work hours and for whatever additional time may be required. Outside employment or involvement in outside business activities could create conflicts of interest or reduce productivity and employees must avoid outside employment or business activities that divert time and attention from Umgeni Water. If any employee is involved in outside work or business activity, such work or business activity must be disclosed and permission must be obtained from immediate superior/s.

Guidelines:

<u>DO</u>	<u>DON'T</u>
<ul style="list-style-type: none">• Annually examine your personal circumstances as they relate to conflict of	<ul style="list-style-type: none">• Become involved in any activity, investment, employment or other relationship that could



<p>interest questions to determine if you need to update your disclosure</p> <ul style="list-style-type: none"> • Use Umgeni Water's declaration of interest form to notify the company of any potential conflict even if you think it probably is not a problem • Fully disclose any activity, investment, employment or relationship that could create even the appearance of possible conflict • Consult the Legal Department or Company Secretary when you are not sure on issues relating to conflict of interest • Keep a copy of your declaration of interest form for your own files • Update your declaration of interest within 30 days, any time circumstances covered in the declaration change 	<p>create a conflict with Umgeni Water's interests without first obtaining permission to do so</p> <ul style="list-style-type: none"> • Fail to notify your superiors with full disclosure of any activities that could create a conflict or promptly update your declaration if your circumstances change
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7. INFORMATION AND USE OF UMGENI WATER PROPERTY

Employees/directors should:

- 7.1 protect Umgeni Water's assets and ensure their proper use. Umgeni Water's assets includes, but not limited to, property (movable and immovable), plants, equipment, information and information technology, all of which must be used only for Umgeni Water business and in accordance with applicable policies. Where employees/directors are not sure whether the use is appropriate or not they must seek guidance from their immediate superiors or the Chief Executive;
- 7.2 not copy Umgeni Water supplied software for personal use;
- 7.3 not intentionally create or insert false or misleading information in any Umgeni Water financial or other business record. Whenever an inaccuracy finds its way

into a record, it should be promptly corrected, and the reasons for the correction should be noted;

- 7.4 not unlawfully destroy, alter or falsify Umgeni Water's business or other record, document or object for the purpose of obstructing or influencing any legal (internal or external) or governmental proceedings or investigations. This principle is also applicable to any third party who has access to Umgeni Water information;
- 7.5 use Umgeni Water's owned vehicles only if authorized by management. Employees must operate such vehicles lawfully and must comply with the [Fleet Management Policy](#).
- 7.6 use the internet only for work assignments. Nominal personal use is permitted if it does not interfere with work productivity and does not conflict with [Internet Policy](#).
- 7.7 acknowledge that all messages transmitted on Umgeni Water's Email become Umgeni Water record and no employee/director should expect that such messages will be treated as personal or private messages. Umgeni Water can access or monitor its Email system for legitimate business reasons, and may delete any Email or disclose it to others without advance notice, unless the law or contract of employment provides differently;
- 7.8 acknowledge that they are the face of Umgeni Water and therefore what they publish on Social Media could reflect on Umgeni Water and its brand. In this regard, employees/directors should take personal responsibility for their online and offline statements and they must make sure that where they have identified themselves as working for Umgeni Water and they express any view that could be associated with Umgeni Water, they must make it clear that their views and

opinions are their own and not those of the company. Offensive, demeaning, abusive or inappropriate remarks should be avoided as many stakeholders have access to the internet and could have access to such posts;

- 7.9 desist from speaking or profess to speak on behalf of Umgeni Water to the media or any third party on any matter affecting Umgeni Water without authority to do so. Official communication to the media or third parties on matters affecting Umgeni Water shall be the responsibility of the Stakeholder Manager or the Chief Executive or the Chairperson of the Board. Should an employee/director receive an inquiry from the media or a third party, such must be promptly referred to the Stakeholder Manager or the Chief Executive or the Chairperson of the Board;
- 7.10 not use Umgeni Water's Email system or computer equipment for any illegal, unauthorized or unethical purpose or to access, transmit or store inappropriate material such as, pornography, depicted nudity, violent material, sexually or racially oriented jokes, or other offensive or demeaning material. In case of uncertainty on whether certain material is offensive clarity should be sought from the Legal Department;
- 7.11 not email Umgeni Water information to their personal email account or otherwise remove information from Umgeni Water, whether in hard copy or using any form of media device to record;
- 7.12 return all Umgeni Water's information in their possession or control if they cease being employees/directors and they should sign a statement confirming that they will treat the information as confidential even after they have left Umgeni Water. Umgeni Water shall take whatever step is necessary to ensure that its information is protected;



7.13 not bring any confidential information from their previous employer or from any third party, unless there is an agreement between such employee/director authorizing the use of such information.

Guidelines:

<u>DO</u>	<u>DON'T</u>
<ul style="list-style-type: none"> • Know and comply with Umgeni Water's Information Technology policies • Treat all Umgeni Water's information and property as valuable business assets • Make sure communications are accurate (whether internal or external) • Comply with all applicable laws and policies regarding the use of computers, email, software, the internet and intranet 	<ul style="list-style-type: none"> • Ignore information security procedures • Give access to Umgeni Water's information to anyone not authorized to receive it • Use Umgeni Water's property for your own personal gain or for political activity • Create or knowingly process misleading or inaccurate information about Umgeni Water business • Use Umgeni Water information resources to create, access, transmit or store any material that is in bad taste, offensive, disrespectful of others, or otherwise inappropriate • Do anything that would disrupt or compromise the availability, integrity or security of Umgeni Water's information, information resources or other property

8. GIFTS AND ENTERTAINMENT

8.1 For the purposes of this Code, Gifts and Entertainment shall include, but not limited to, discounts, loans, cash, favorable terms on any product or service, prizes, transportation, use of vehicles or vacation facilities, shares or other securities, participation in share offerings, home improvements, event tickets, gift certificates, sports events, spa treatments, golf days and so forth.

- 8.2 Employees/directors should not give or accept gifts, gratuities, entertainment or any other personal benefit or privilege that could in any way influence or appear to influence their objectivity in the execution of their duties.
- 8.3 Notwithstanding anything else in this Code, the following gifts or entertainment are strictly prohibited:
- 8.3.1 The giving or receiving of cash or cash equivalent;
- 8.3.2 The giving or receiving of any gift or entertainment that would constitute a contravention of any law;
- 8.3.3 The giving or receiving of anything which creates an obligation to reciprocate;
- 8.4 Inexpensive and non-recurring gifts or entertainment not exceeding a nominal value (that is the amount of R 1000.00) may be accepted, but they may not necessarily need to be declared in the register of gifts and may be retained without the approval of immediate superior/s.
- 8.5 All gifts and entertainment exceeding a nominal value as well as gifts and entertainment of a recurring nature of any value:
- 8.5.1 shall only be given or received with the express written approval of an immediate superior and such approval may only be given in exceptional circumstances where such gifts or entertainment are clearly in the best interests of Umgeni Water;

8.5.2 must be declared in the official register of gifts, only when the gift entertainment is accepted;

8.5.3 are Umgeni Water property once approved and accepted and may not be retained by the employee/director for personal benefit under any circumstance;

8.5.4 All gifts retained by Umgeni Water will be donated to an appropriate charity through the normal Corporate Social Investment process or disposed in accordance with Umgeni Water's asset disposal policies.

8.6 Umgeni Water may entertain its customers or other stakeholders where such entertainment is clearly in the best interests of Umgeni Water and is done within the auspices of existing policies and procedures, such as [Corporate Suite Policy and Procedure](#).

8.7 Contributions to political parties or government officials may be interpreted as an inducement of future beneficial treatment and interference in the democratic process and is therefore strictly prohibited.

9. INTEGRITY TOWARDS ENVIRONMENT

Umgeni Water is committed to:

9.1 restoring and preserving the environment;



- 9.2 reducing waste and pollutants, conserving resources, and recycling materials where necessary;
- 9.3 participating actively in educating the public regarding water and environmental conservation;
- 9.4 implementing technologies that would help conserve and preserve the environment;
- 9.5 continuously assess the impact of its processes on the environment and the communities in which it operates.
- 9.6 promote and adhere to objectives envisaged in the National Environmental Management Act No.59 of 2008.

Guidelines:

<u>DO</u>	<u>DON'T</u>
<ul style="list-style-type: none">• Become familiar with Umgeni Water's environmental principles• Report to your superior/s any incident or practice inconsistent with Umgeni Water's environmental principles	<ul style="list-style-type: none">• Assume environmental issues are the concern of experts only• Ignore any practice you see that violates environmental laws or Umgeni Water principles• Fail to address with appropriate leadership any inaccurate report on an environmental issue

10. SUPPLIERS AND BUSINESS PARTNERS

Umgeni Water:

- 10.1 acknowledges that it can only achieve its service delivery mandate if it enjoys the loyal and unwavering support of its suppliers, contractors and business partners, and therefore views its relationship with suppliers, contractors and business partners as mutually beneficial partnerships in which all parties integrate their talents, resources and efforts to exceed expectations, whilst continuously striving to do better.
- 10.2 suppliers of goods, services and capital are afforded a fair opportunity to compete for business on the basis of clear and transparent procurement process. This aspect is more fully regulated by the Supply Chain Management Policies.
- 10.3 is committed to contribute significantly to black economic empowerment in South Africa in accordance with its Broad Based Black Economic Empowerment Policy. This aspect is more fully regulated in the BBBEE Policy.
- 10.4 shall not do business with suppliers, contractors or business partners whose business practices contravenes the principles of International Labour Organization Protocol on Decent Work and Working Conditions, anti-corruption laws or any other ethical values.
- 10.5 must encourage its employees/directors to take active steps to ensure that they have a sufficient understanding of services and products provided by third parties to ensure that Umgeni Water is not exposed to illegal or unethical practices by such third parties.

11. CORPORATE SOCIAL INVESTMENT

- 11.1 Umgeni Water acknowledges it will perform better if the communities in which it operates are stable and prosperous and therefore its corporate social investment programmes are focused and managed to make a positive impact where it operates. This aspect is more fully regulated by the Corporate Social Investment Policy.
- 11.2 Umgeni Water’s Corporate Social Investment programme is currently focussed on:
- 11.2.1 Education and training
 - 11.2.2 Job creation and capacity building
 - 11.2.3 Arts and culture
 - 11.2.4 Public health, community development and support
 - 11.2.5 Environmental conservation;
- 11.3 Although the administration of corporate social investment resides with the CSI Committee which reports to the Executive Committee, the Board of Directors is ultimately accountable for corporate social investment.

12. BRIBERY AND CORRUPTION

- 12.1 Umgeni Water will not engage in, nor tolerate, any corrupt or dishonest practice such as bribery, fraud, falsification and misrepresentation. It is unacceptable to directly or indirectly offer, pay, solicit or accept bribes in any form. This item is further regulated through the [Integrated Fraud Management Framework and the Fraud Prevention Plan](#)

- 12.2 No employee/director shall directly or indirectly request, accept, offer or grant a personal advantage in connection with a business activity – especially in the negotiation, awarding or performance of a contract – regardless of whether the other party to the transaction is an individual, a company or a government agency.
- 12.3 No employee/director shall make or accept any payment or kickback, nor offer or accept improper financial or other advantage to or from any person for the purpose of obtaining a permit, authority, business or other services. Any attempted transaction of this nature should be immediately reported to immediate superior/s, Internal Audit or Hotline.

13. CUSTOMERS AND OTHER STAKEHOLDERS

Umgeni Water is committed to:

- 13.1 meeting customers' needs by delivering excellent and reliable service;
- 13.2 understanding customers' ever changing needs and meeting them;
- 13.3 listening to and responding quickly to customers' agreed requirements;
- 13.4 actively seeking feedback from customers to confirm their satisfaction with the service that is being rendered to them;
- 13.5 taking responsibility for addressing poor customer service in its service area;



- 13.5 basing its goals on the requirements of customers and shareholder;
- 13.6 treating all stakeholders with respect and understanding the impact its decisions could have on them. This item is further regulated in the [Stakeholder Management Strategy](#).

14. HUMAN RIGHTS AND DIGNITY

Umgeni Water:

- 14.1 supports the concept of human rights as enshrined in the Constitution of the Republic of South Africa and the Universal Declaration of Human Rights;
- 14.2 respects the rights to life, liberty, security and the right to be free from slavery, servitude, torture or cruel, inhuman or degrading treatment or punishment;
- 14.3 will not tolerate unacceptable treatment of workers such as exploitation of children, physical punishment, or involuntary servitude. Umgeni Water expects its suppliers and customers to practice the same standards;
- 14.4 respects people’s rights to privacy, in matters relating to family, home, correspondence and reputation;
- 14.5 respects people’s rights to freedom of conscience and religion, opinion, expression and association;



14.6 respects people’s rights to social security and to the economic, social and cultural rights indispensable to human dignity and the free development of each individual’s personality.

15. CORPORATE GOVERNANCE

Umgeni Water’s corporate governance framework is aimed at:

- 15.1 retaining full and effective control over its business activities and supporting internal departments. Every manager should implement internal control, legal compliance and risk management process (including fraud prevention) in their areas of responsibility;
- 15.2 determining the strategies and strategic objectives. Each manager must ensure that the strategic objectives of their areas of responsibility are aligned those of the organization at corporate level;
- 15.3 determining and setting the tone of Umgeni Water’s values, including principles of ethical business conduct. Every manager should ensure that Umgeni Water’s values (including this Code of Ethical Conduct) are implemented in their areas of responsibility;
- 15.4 ensuring that independent, informed and effective judgement is brought to bear on material decisions by a structured approach to approval authorities. Each manager should have a clear understanding of the extent to which decisions in their areas of responsibility should be reported or referred for final decision making. Managers should also clarify and formalise role, approval and signing

powers, responsibilities and accountability of individuals, in their areas of responsibility;

- 15.5 monitoring the implementation corporate business strategy, policies and effective risk management framework. Each manager should take active steps to ensure that applicable laws and policies are applied in their areas of responsibility.

16. CROSS REFERENCE

- 16.1 Fraud Prevention Plan
- 16.2 Recruitment and Selection Policy;
- 16.3 Training and Development Policy ;
- 16.4 Performance Management Policy;
- 16.5 Assisted Education Policy;
- 16.6 Succession, Mentoring and Coaching Policy;
- 16.7 HIV/AIDS Policy;
- 16.8 Fleet Management Policy;
- 16.9 Internet Policy;



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- 16.10 Corporate Suite Policy and Procedure;
- 16.11 Supply Chain Management Policies;
- 16.12 BBBEE Policy;
- 16.13 Corporate Social Investment Policy;
- 16.14 Integrated Fraud Management Framework;
- 16.15 Stakeholder Management Strategy.
- 16.16 Disciplinary Policy and Procedures
- 16.17 Conflict of Interest Policy