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Ethics at the  
Heart of Our  
Business.

**TSEBO**

# Ethics at the Heart of Our Business.

Our global clients subscribe to global best practices of governance and ethics – they rely on us to underwrite that with our own systems and uphold their commitments.

We are a fully transparent partner for our clients and promote the highest standards of ethical behaviour.

We are aligned to global codes of good corporate governance:

## GROUP COMPLIANCE FRAMEWORK

We have a methodology and systems that root out and manage corporate governance and ethical risks.



### PROCESSES AND PILLARS

#### KING IV

- Responsibility
- Accountability
- Fairness
- Transparency

#### UN Global Compact Principles

- Human Rights
- Labour
- The Environment
- Corruption

#### CODE OF ETHICS

Signed annually by every management employee – committing them to the highest standards of ethical conduct

#### ANTI-BRIBERY AND CORRUPTION (ABAC) POLICY

Zero tolerance policy. All employees are bound by this policy and receive regular training on its meaning

#### ABAC DECLARATION AND INCIDENTS REGISTER

Individual written commitment signed by all managers, specifically relating to Bribery and Corruption

#### ABAC SUPPLIER WARRANTY

Individual commitments signed by all suppliers, declaring absolute above-board, arms-length dealings

#### DATA AND INFORMATION POLICY

Strict company codes on the use of confidential client information / personal information

#### GIFTING POLICY AND REGISTER

Strict guidelines on gift giving / acceptance, with specific limits attached. All gifting is logged on an official company register for audits

#### POLICIES

#### SETC (Social Ethics and Transformation Committee)

Board sub-committee that oversees all aspects of compliance, steers strategy and answers directly to shareholders



#### INTERNAL AUDIT DEPARTMENT

Independent compliance practitioners

#### INCIDENT RESPONSE PLAN

A standardised approach for managing ABAC incidents in line with international best practice

#### TIP-OFFS ANONYMOUS

Anonymous ethics hotline / incident reporting mechanism



for whistle-blowers. Every single report goes directly to the Group CEO, SETC and internal audit department for immediate investigation.

#### MECHANISMS

#### LEGISLATIVE TRAINING

Regular training for all company boards, updating decision makers on latest trends and developments in compliance



#### COMPLIANCE TRAINING

Regular training for all front-line commercial managers



#### TRAINING

## WE PUT A SPOTLIGHT ON ETHICAL MISCONDUCT AND CORPORATE RISKS



RESPECT  
INTEGRITY  
REPUTATION  
DEPENDABILITY  
COMPETITIVE ADVANTAGE

\$ \$  
BRIBERY

\$ \$  
THEFT

\$ \$  
CORRUPTION

\$ \$  
DISHONESTY

\$ \$  
FRAUD

\$ \$  
MISMANAGEMENT

In 2009, we uncovered deep-rooted corruption in the heart of a newly acquired and highly profitable business. We led a public outing of all parties involved, even though it destroyed profitability in that unit for a 3-year period. Legal action was brought against all involved and numerous prosecutions were undertaken.

**Rigorous** Governance and **Disciplined** Ethical **Compliance** that Delivers Assurance