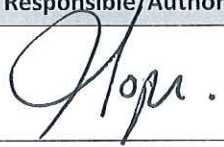
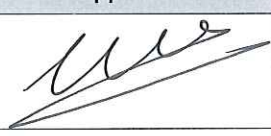




Code of Conduct

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| Rev. No. | 05 |
| Rev. Date | 26/02/2019 |

CODE OF CONDUCT

| Rev Code | Issue Date | Description of Revisions Made | Signatures | |
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1 THE WBHO WAY

If you are reading this, you are probably already part of the success that is WBHO. You will know that a big part of what makes our organisation special is that we have retained our culture and our values — our core sense of who we are — over the years.

The intention is that the Code of Conduct would serve as an umbrella to include the greater Stakeholder Community.

Known collectively as the 'WBHO Way', these principles include:

1.1 Reputation

Our reputation is one of our greatest assets. We actively work to build a reputation of reliability through excellence in our people, systems and products. When our actions in any way contravene our shared values of teamwork, communication, integrity and excellence, it can adversely impact on our positive reputation.

1.2 Quality

Quality is of utmost importance to the group and both management and employees must pursue this at all times. Performance of duties should be at the expected level of skill, knowledge, experience and judgement.

1.3 Cost-Awareness

Management and employees have a responsibility to consider efficiencies where possible, such as cost cutting, value engineering and any other methods that provide our stakeholders with quality structures within set budgets. This responsibility further includes exercising due care, avoiding waste and preventing the misuse or abuse of company assets.

1.4 Teamwork

We are a team. We succeed together. When we can help our colleagues, we do. When we need help, we ask. We do not ignore a colleague who needs our assistance, even if they have not asked for our help. We are also willing to participate in activities and projects that promote WBHO.

1.5 Culture

We have a positive, 'can do' attitude and always 'go the extra mile' for our clients. We always strive to be flexible, dependable, hard-working and a 'pleasure to do business with'.

These shared values have guided and shaped us and the big things that we achieve at WBHO are a direct result of the many small acts of consideration, respect and kindness that we show each other every day. As a member of WBHO, you are an important part of our collective success.

Without you, and the people around you, we would not be able to achieve the great things we have.

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2 WHY DO WE HAVE A CODE OF CONDUCT?

The purpose of this code of conduct is to help you understand what is expected from you as a member of the WBHO community. It is a set of legal, ethical and moral guidelines that describe the behaviour we expect of each of us and the minimum standards against which we hold ourselves accountable.

By clarifying these expectations and standards we hope to help you succeed and prosper within WBHO and, by extension, WBHO to succeed and prosper within the communities in which it operates.

2.1 Our Code Belongs to Us

This code of conduct applies to all employees of the group. Please read our code carefully. Knowing and understanding these principles will help you determine how to behave and what to do in the workplace. As well as helping each of us to be a successful co-worker, this code helps us all to 'do the right thing when no one is looking'.

Our code belongs to each of us. It represents an ongoing conversation about who we are and what we value as a community. We are all welcome, and encouraged, to participate in this discussion and if there is something that you would like to see added to, or changed, in the code, please contact the Company Secretary.

2.2 What to do if you are Unsure

If any aspect of this code is unclear to you or a dilemma arises that is not covered specifically, please discuss the situation with your line manager.

Prefer to report or discuss something anonymously?

Contact WBHO Alert using the free telephone service number 0800-202-121 or by emailing wbhoalert@telkomsa.net

2.3 Breaches of the Code

The code of conduct is designed to protect the reputation of the company. Accordingly, we take this code, and the responsibilities specified within it, very seriously. Failure to uphold the principles and obligations outlined in this code is likely to result in disciplinary procedures being instituted against you.

Any breaches, or suspected breaches, of the code of conduct by a co-worker are to be reported to your manager. If it is not possible to communicate the issue with your line manager, please refer to the Whistle Blowers Policy for guidance on how to proceed.

2.4 Safety, Health, The Environment And Quality (Sheq)

2.4.1 Safety

It is our duty to create a safe environment and to prevent accidents and injuries to ourselves and our co-workers. No job is so important that it cannot be executed safely. Each of us has a duty to look out for one another and keep each other safe. Our health and safety policies have been designed to ensure the safety and wellbeing of all WBHO employees.

Strictly adhering to the requirements of our health and safety policies, at all times, is mandatory. You must work in a methodical and careful manner. If you are asked to do anything that you feel

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you are not qualified or experienced enough to do safely, you are required to share your concerns with your line manager immediately.

2.4.2 Alcohol, Drugs and Smoking

We cannot allow the risk of harming ourselves or others by operating machinery or using tools (manual or powered) while intoxicated. We are considered 'unfit for duty' if we have consumed alcohol or taken drugs (legal or illegal) that have weakened our abilities and coordination.

Due to the potentially dangerous nature of entering a WBHO workplace or project site while under the influence of alcohol or drugs, disciplinary action will be instituted against any employee doing so — unless the consumption of alcohol at that specific time and in that specific location has been approved by a member of senior management.

Out of our duty to look out for one another we are required to report an intoxicated co-worker to his or her manager immediately.

In observing the legislation that prohibits smoking in public environments, we will only smoke in designated smoking areas.

2.4.3 The Environment

We acknowledge that we have a moral and legal responsibility to safeguard the environment. Protecting the environment is considered to be as important as protecting the safety of our co-workers. We should be conscious of the impact of our activities on the environment and the communities around us.

We should always use the minimal amount of water and energy and must recycle materials where possible. We must dispose of waste water, materials and effluent responsibly and avoid contaminating or polluting the soil, air and rivers around us.

Should a spill or other contamination occur, it must be reported immediately so that the damage can be rectified. Any attempt to conceal a contamination event is expressly prohibited.

2.4.4 Quality

WBHO understands that repeated client satisfaction through the delivery of quality products and services are critical to the ongoing success of the group and provide a competitive advantage over its peers within the industry. Furthermore substandard products presents threats to the safety of our employees and the end users of our product.

To this end, quality standards have been developed and implemented throughout the group along with a two primary quality objectives, namely:

- to create a culture of quality within the group, and
- to deliver to our clients the standards of quality specified in the contract
- It is our duty to exercise due care in working towards these objectives.

2.5 Ethical Conduct

This section of the code lists the principles that underpin the behaviour we expect of each of us in the workplace. The focus is not on what to do as a co-worker in a specific situation, but what kind of co-worker to be at all times.

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2.5.1 Equality

We work in an environment that is diverse, multi-cultural and free from discrimination and prejudice. We evaluate each other solely on how well we perform our jobs.

Decisions regarding our colleagues as well as our behaviour towards our colleagues must be governed by attributes that are related to job performance only. Examples of the attributes of colleagues that are irrelevant in our workplace include their race, gender, religion, personal associations, nationality, age, disability, political beliefs, marital status, sexual orientation, and family responsibilities.

Remuneration is set at acceptable, equitable levels throughout the group and, where necessary, within the limits laid down by statute.

2.5.2 Honesty and Integrity

We act with honesty and integrity. We tell the truth. We acknowledge and take responsibility for our

mistakes, errors and omissions. We do not misappropriate, steal or exchange company property, including information, for personal benefit. We ensure that business-related purchases are kept separate from personal purchases and that reimbursement is transparent and correct.

2.5.3 Accountability

We hold ourselves accountable for what we say and do. We honour our commitments at work. When we make a promise to a client or a colleague, we do our utmost to keep it.

2.5.4 Duty of Care

All employees are responsible for the appropriate use and safeguarding of assets under their control. WBHO assets must not be used for personal benefit and should be used properly, sensibly and effectively, at all times.

2.5.5 Harassment and Bullying

We deserve to be treated fairly, with dignity and with respect. Being considerate of our colleagues and treating those who work with us with fairness and respect is compulsory. Our duties in the workplace should be carried out without risk to our physical or mental health, safety and wellbeing; hence, saying or doing anything that a co-worker would find unwelcome, humiliating, intimidating or offensive will not be tolerated.

When we witness interactions that might be considered harassment or bullying, by a fellow employee or management, we will bring such behaviour to the attention of the person responsible or report it to the manager under whose care the individuals involved have been placed.

2.5.6 Fraud, Bribery and Corruption

WBHO expressly prohibits fraud, bribery and corruption in all of its business dealings. The trust and respect of our colleagues and clients is important to us. Improperly influencing other people, misrepresenting the situation or exploiting the trust we have been given will, ultimately, damage the reputation and prosperity of the company and our colleagues. We do not use our position for unfair, dishonest or illegal personal benefit.

Bribery involves deliberately making a payment, of any value, to any person to (i) distort a proper decision making process, (ii) to influence a person's decision, (iii) to secure improper commercial advantage or (iv) to enter into a dishonest arrangement.

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Corruption is the act of modifying the usual course of one's function in such a way that it results in personal advantage or profit. Any form of exploitation of the company for personal advantage or profit is prohibited.

If you are at all concerned that any activity (either your own activity or that of another WBHO employee) could represent bribery or corruption, you are required to raise this with your manager or by using the anonymous fraud hotline, WBHO Alert.

2.5.7 Gifts and Hospitality

There should be no doubt as to the intention behind any offers of sponsorship or hospitality or gifts that we exchange with clients, suppliers and sub-contractors. While we frown upon the exchange of any amount of cash in the workplace, we consider the exchange of occasional gifts valued at less than R1500 to be acceptable and there is no need to disclose such.

To safeguard our reputation, the exchange of anything that is worth more than R1500 needs to be conducted openly and transparently. If the item is worth between R1500 and R2500, the approval of a director of the company must be obtained within five working days of receiving or giving the gift.

If an item is worth more than R2500, the approval of the Executive Committee (Exco) through one of its members must be obtained within five working days and the exchange must be recorded in the Gift Register held by the Group Company Secretary.

Similarly, all trips offered by a third party that will require us to be away from home for a night or more, require the approval of Exco through one of its members and the excursion must be recorded in the Register of Trips held by the Group Company Secretary.

2.5.8 Conflicts of Interest

The continuing success of WBHO is based on making sound, professional business decisions. Making the best professional decisions requires being objective and impartial. Projects or matters that involve WBHO and the interests of people and/or companies with whom we have close ties could affect our objectivity and impartiality. If a situation arises that could undermine our perceived impartiality, we protect our integrity and the professional trust placed in us by notifying our line manager immediately.

You may not engage in any outside employment or conduct any business, trade or profession without written permission from the relevant Group Managing Director.

2.5.9 Compliance

The laws and regulations that govern us are designed to make our lives as free, fair and safe as possible. As responsible citizens and representatives of the WBHO community, employees are expected to abide by the law at all times, within all of our operations. Any deliberate breaches of the law will be dealt with very seriously. Employees are also expected to adhere to all environmental and safety regulations both those specified by the group and statutory regulations. In particular, do not engage in any unlawful or unprotected industrial action.

2.5.10 Competition Act Legislation

WBHO is committed in its endeavours to ensure full compliance with the provisions of competition legislation in all jurisdictions where it is active. Employees are to take all necessary steps to ensure compliance with all applicable Competition Law and relevant WBHO procedures. This responsibility also extends to every employee of the company for whom they are responsible. Employees who

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contravene competition legislation in any material respect will be subject to disciplinary sanctions and/or may be summarily dismissed for gross misconduct. The provisions of the Competition Act are very technical and onerous and a specific WBHO Competition Compliance Policy has been drafted regarding these legal obligations and responsibilities. For further information, please contact the Group Legal Officer.

2.5.11 Confidentiality

We all have the right to privacy, as individuals and as a company, and, in turn, we respect the privacy rights of others — our co-workers, clients, contractors and suppliers.

2.6 Intellectual Property

WBHO Intellectual property (IP) is anything that an employee creates while working for WBHO and such IP remains the property of the group from the date of its creation. Computer hardware, software and all data contained thereon, as well as any company data on your home or non-WBHO electronic systems, are considered WBHO assets and property and should remain confidential at all times.

2.7 Personal Privacy Obligations

You have an obligation, and a personal responsibility, to protect the privacy of other employees, clients, contractors and suppliers.

2.8 Communication With The Public

In matters of topical interest, employees are unlikely to be in a position to know all the facts and, consequently, may give the wrong impression and/or information, which could prove damaging to the image and reputation of WBHO. Similarly, statements on industrial disputes or site incidents can easily be misinterpreted when they are not based on a complete knowledge of the facts of a particular case.

2.9 Confidentiality after Ceasing Employment

Your obligation to protect the confidential information of the company continues after your employment ceases. For more information, refer to the confidentiality agreement you signed at the commencement of your employment. You must not use any confidential WBHO information for personal benefit, or the benefit of anybody else, disclose it to a third party, copy it or take it with you when you leave.