



STEYN CITY

PARKLAND RESIDENCE

STEYN CITY SCHOOL
THIRD-PARTY CODE OF ETHICS

November 2023

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1 INTRODUCTION

Steyn City School (“School”) operate in a regulated industry and is expected to comply with applicable industry laws, regulations, and international standards. Any Third Party wishing to provide goods and services to, or work for or on behalf of Steyn City School must comply fully with all relevant laws and regulations and meet the minimum ethical standards set out in this code of conduct “Code.”

This Code reflects the universally accepted principles contained in the United Nations Global Compact on human rights, labour, environment, and anti-corruption and further describes the minimum standards of ethical and responsible conduct required from our Third Parties¹.

Steyn City School is committed to implementing systems and controls to ensure that all suppliers, agents, brokers, partners, consultants, contractors, sub-contractors, joint-venture partners, and other representatives (“Third Parties”) working on behalf of Steyn City School are appointed and managed responsibly, in accordance with this Code.

All Third Parties working for and/or on behalf of Steyn City School undertake to be committed to the requirements set out in this Code.

2 Applicability

This Third-Party Code of Ethics sets forth Steyn City School’s expectations for the Third Parties and is therefore applicable to all Steyn City School Third Parties.

Third Parties are expected to be familiar with the business practices of their own suppliers, agents, sub-contractors and other third parties and to ensure that these entities also operate within the guidelines of this code.

Further, Third Parties must understand Steyn City School standards and embrace the same high ethical standards of business conduct that has long been at the core of how Steyn City School conduct its business/operation.

¹ Third Parties are defined as individuals or entities contracted or sub-contracted to work for or on behalf of Steyn City School or provide goods or services to the Steyn City group of companies.

3 LEGAL AND REGULATORY COMPLIANCE

Third parties must comply with all applicable laws, codes, and regulations in the industry in which they operate. This includes, but is not limited to, laws and regulations relating to environmental and occupational health and safety, security, labour practices, anti-money laundering, competition, corruption, and data privacy and protection. Steyn City School expects Third Parties to ensure that the principles set out in this Code are implemented and communicated throughout their organization and made available to their employees.

3.1. Bribery and Corruption

Steyn City School expects Third Parties to conduct business transparently, honestly, and fairly and further abide by all applicable anti-corruption laws. Third parties must not attempt to influence others, directly or indirectly, through an offer, promise or payment of a bribe or anything else of value to gain or retain a business advantage.

3.2. Anti-Money Laundering

Third Parties must be aware of any signs of money laundering when conducting business with their own third parties. Money laundering is the illegal process of concealing the true origin of illicit funds through transactions that appear to be legitimate. Third parties are expected to be alert to red flag any business partners who refuse to provide information about their identities or common transaction details or make unexplained transaction changes.

Third Parties must also implement robust internal processes to ensure adherence to “Know Your Customer” laws and best practices in identifying money laundering activities.

3.3. Fair Competition

Third Parties are expected to compete fairly and always comply with applicable competition laws and regulations. Whether it is on Steyn City School’s behalf or otherwise. Third Parties should not work with or agree to collaborate with competitors to prevent or restrict free and fair competition. When negotiating contracts (with other entities), Third Parties must never discuss or engage in price fixing, bid rigging, coordinating with others to restrict business, or allocating customers, markets, or territories.

3.4. Trade Compliance

Third Parties must comply with applicable international trade laws and regulations, including import and export controls, sanctions and anti-boycott laws and regulations that could apply to the products, goods and services related to Steyn City School's operations. Third Parties must further ensure that all valuations, declarations, and documents pertaining to trade and customs matters are accurate and complete.

3.5. Data protection

Third Parties must comply with all applicable laws and regulations when processing, transmitting, or storing personal information. Third Parties must take reasonable measures to ensure that data is protected. In the event of any unauthorised access, disclosure, or breach of personal or sensitive personal information belonging to Steyn City School, Third Parties will notify Steyn City School without delay and as provided by applicable contractual and legal requirements. Third Parties must further comply with reporting or disclosure requirements in line with applicable reporting legislation or standards.

3.6. Copyrights, Patents and Trademarks

Third Parties must comply with the intellectual property rights of Steyn City School and other entities, including, but not limited to, copyrights, patents, trademarks, and trade secrets. Software and hardware must be used only in accordance with their associated license or terms of use.

4 ETHICAL BUSINESS STANDARDS AND CONDUCT

4.1. Business Integrity

Third Parties are prohibited from engaging in any illegal or inappropriate activities including, but not limited to, corruption, misrepresentation, extortion, money laundering and bribery, as this may result in the termination of any or all agreements with Steyn City School.

4.2. Confidential Information

Third Parties must protect confidential information that belongs to Steyn City School or any other entity with whom Steyn City School engage/associate with. This includes any

non-public information that might be harmful to Steyn City School's reputation if disclosed. Some examples of confidential information include personal information Steyn City School may collect from its customers.

Steyn City School expects its Third Parties to carefully manage personal information, such as identity, medical, employment and financial information, and never collect, process, use, transfer or disclose personal information outside of a specified business purpose.

4.3. Conflicts of Interest

Third Parties should avoid engaging in any activity that would conflict, interfere, or even create the appearance of a conflict between their business and Steyn City School. Third Parties must disclose any potential conflict of interest to Steyn City School management in writing as soon they become aware of such conflict of interest.

4.4. Gifts and Entertainment

Steyn City School management expects its Third Parties to avoid being or appearing to be improperly influenced by gifts and entertainment, such as providing gifts and entertainment to influence business decisions improperly. Gifts and entertainment should be of nominal value, never in cash and consistent with local standards and customs.

5 ENVIRONMENTAL AND SOCIAL REGULATIONS

5.1. Labour Practices

Steyn City School follows all laws and regulations governing its employment practices and acceptable treatment of employees and, therefore, expects its Third Parties to follow the same standards. This includes laws prohibiting slavery, child labour, bonded labour, and human trafficking, as well as regulations related to minimum working wage, working hours restrictions, collective bargaining, workplace conditions and any form of discrimination.

Third Parties must also maintain a workplace where no harassment of any kind is tolerated. Harassment includes, but is not limited to, unwanted physical contact; making or distributing offensive pictures, videos, and spoken or written remarks; and any other unwelcome conduct that could create an intimidating or hostile workplace.

5.2. Environmental, Health & Safety

Third Parties must maintain a workplace that complies with all applicable laws and regulations, including any standards established by Steyn City School management, regarding operational Health and Safety, environmental responsibility, and the use, storage, and disposal of any hazardous materials. Steyn City School management encourages its Third-Party partners to consider business processes that reduce the Third Party's adverse impact on the environment by minimizing waste and conserving natural resources.

Third Parties are further expected to foster a safe workplace for all, address safety hazards, comply with all applicable laws and regulations and promote a safe working environment.

5.3. Human Rights

Steyn City School management is committed to respecting and supporting the Human Rights principles and values laid out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

5.4. Relationships with Politically Exposed Persons

Third Parties agree to disclose any close relationships with individuals who are or have been entrusted with prominent public functions by a country (Politically exposed persons), for example, heads of state or ministers, senior politicians, senior government officials, judicial officials, senior executives of state-owned corporations, important political party officials etc. Third Parties should disclose such relationships with any "Politically exposed persons" to Steyn City School management.

6 MONITORING AND EVALUATION

Steyn City School reserves the right to periodically review any third party's compliance with this Code, including by conducting audits and other reviews of any third party's environmental, labour practices, and other business practices described in this Code.

7 COMMUNICATIONS AND REPORTING

To the extent permitted by law, Steyn City School management expects Third Parties to promptly notify it of any questions or concerns regarding the Third-Party Code of Ethics or if they become aware of a situation that violates or appears to violate, Steyn City School's Third-Party Code of Ethics. Third parties and their employees may contact Steyn City School's independently managed and anonymous reporting online whistleblowing portal: fraud@telesure.co.za or 086 111 5653.

Steyn City School prohibits retaliation against anyone reporting a concern in good faith and expects any Third Party to comply with same.

8 POLICY REVISION

8.1 This Policy is subject to review and amendment without prior notice. Any review and update hereof will take account of new laws, regulations, and technological developments.

8.2 Steyn City School management ensures that any amendments hereto are communicated on our publicly available platforms, such as our website, for the benefit of the public we serve and any other persons who may be affected by this Policy.

8.3 The policy will be reviewed every two years.

9 VERSION CONTROL

Last updated **November 2023**.