



## **CODE OF CONDUCT POLICY**

### **OBJECTIVE**

This policy aims to describe the standards of behaviour to which we are committed as a company in full compliance with all applicable laws. It is an extension of tTech's vision and mission and therefore requires good judgment to be exercised when making business-related decisions and to guide our overall conduct.

### **POLICY STATEMENT**

tTech's reputation and work environment are based on the actions and behaviours of our employees. We must provide a valued experience to those receiving service both within and outside of our company. Therefore our business practices including the interactions, activities and relationships involving staff, customers, business partners, shareholders, competitors and the wider community must be characterized by integrity, fairness and trustworthiness.

The company and all its employees must be above suspicion and beyond reproach, and must be perceived in this manner. This means avoiding actual or apparent conflicts in personal and professional relationships. Our core business invites people and organizations to trust us with their private data and information. In addition, we target customers for long-term business relationships. This means that trust is a cornerstone of how we operate and it is reinforced by a commitment to ethical business practices. Our success is dependent on maintaining high ethical standards of behaviour. It is thus the expectation of tTech that each employee shares in this commitment. Even a momentary lapse could erode the trust that years of operation has generated.

Ignorance of any aspect of this policy is not an acceptable excuse for non-compliance. Every employee has a duty to seek guidance when they harbour doubt as to the proper course of action in any given situation. It is their ultimate responsibility to do the 'right thing'. This responsibility follows the basic principles of:

- Acting legally and honestly
- Avoiding any conduct that could damage or risk tTech's reputation

Employees must not use their positions or the knowledge gained as a result of their positions for private or personal gain. Neither should they engage in any activity whether of a business nature or otherwise, which would or is likely to:

- cause a conflict of interest with the faithful discharge of their duties to the company; or
- interfere with the independent exercise of judgment in the company's best interests.

Team Leaders/Supervisors and Managers are responsible for counselling employees promptly when their conduct or behaviour is inconsistent with the intent of this policy.

### **Teamwork**

In addition to maintaining a positive outside perception, the conduct expected must be reflected internally. All tTech employees are to proactively promote and be an example of ethical behaviour among peers, at work and in the wider community. Our team was founded and continues to operate on a platform of empowerment, openness and respect. These values must be at the forefront of how we conduct business daily.

Teamwork is central to our operation so we must respect each other. Any conduct which is discriminating in nature based upon a person's race, colour, social class, political opinions, religion, marital status, physical or mental disability, sex, age or sexual orientation is not condoned. Valuing everyone strengthens collaboration and productivity.

Furthermore, tTech will endeavour through its management team to foster a culture of accountability and integrity. This includes a duty to share knowledge and maintain professional skills that are relevant to customers' needs. tTech will also endeavor to acknowledge and reward where there is demonstrated excellence in the conduct of the company's business.

### **Prompt Communications**

In all matters relevant to customers, suppliers, government authorities, the public and others in the company, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

## **Privacy and Confidentiality**

When handling financial and personal information about tTech, its employees or related parties (e.g. directors), customers or others with whom the company has dealings, observe the IT Acceptable Use Policy in tandem with the following principles:

- Collect, use, and retain only the personal information necessary for the company's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary and/or as required by law.
- Protect the physical security of this information and do not use for personal advantage.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use personal information only for the purpose for which it was originally obtained.
- Respect the confidentiality of information acquired in the course of one's work and disclose only when authorized or otherwise legally obligated to disclose.

## **Dealing with Outside People and Organizations**

Employees must take care to separate their personal roles from their company positions when communicating on matters not involving company business.

- When communicating publicly on matters that involve company business, employees must not presume to speak for the company on any topic, unless the views they express are those of the company, and it is the company's desire that such views be publicly disseminated.
- When dealing with anyone outside the company, including public officials, employees must take care not to compromise the integrity of or damage the reputation of either the company, or any outside individual, business, or government body.

## **Use of Company Funds and Other Assets**

The company will have a zero tolerance approach to fraud and dishonesty. When an employee's position requires spending company funds or incurring any reimbursable personal expenses, that individual must use good judgment on the company's behalf to ensure that good value is received for every expenditure. Company funds and all other

assets of the company are purposed for the company only and not for personal benefit unless prior authorization is given.

### **Company Records**

Accurate and reliable records of many kinds are necessary to meet the company's legal and financial obligations and to manage its affairs. The company's books and records must reflect all business transactions in an accurate and timely manner. The employees responsible for accounting and recordkeeping must fully disclose and record all assets and liabilities as well as exercise diligence in enforcing these requirements.

### **Dress Code**

It is expected that employees of tTech are dressed professionally and consistently with the image of the organization.

### **Attendance, Punctuality and Working Hours**

It is the responsibility of every employee to abide by the working hours stipulated in their employment contracts or otherwise agreed since the commencement of their employment at tTech.

It is the responsibility of all employees, as far as possible to conduct their personal affairs during their own time. Where personal time is required, employees must communicate in advance with their Team Leader/Supervisor to request permission.

We understand that the vicissitudes of life may demand actions outside of these normal expectations. In that regard, we require prompt communication with a Team Leader/Supervisor and the rest of the team informing them of the circumstances. A blatant disregard for attendance, punctuality and/or the required working hours will however be met with disciplinary action.

**This policy helps us to implement our corporate principles by establishing certain non-negotiable minimum standards of behavior in key areas. The company will not condone any activity that fails to withstand close public scrutiny. Contravention of this policy is therefore a serious matter to the company and will be treated as such.**