

THE BRANCH OF KNOWLEDGE THAT DEALS WITH MORAL PRINCIPLES.

# CODE OF CONDUCT AND ETHICS

HUMAN CAPITAL







AT THE HEART OF OUR **OPERATIONS LIES OUR COMMITMENT TO INTEGRITY, RESPECT, AND ETHICAL** CONDUCT.

## NOTE FROM THE CEO

Dear colleagues,

The NHFC Code of Conduct and Ethics embodies our collective dedication to maintaining the highest standards of professionalism and ethical behaviour. It provides a framework for decision-making, guiding us towards actions that drive business growth and uphold our integrity and reputation.

At the heart of our operation lies our commitment to integrity, respect, and ethical conduct. These values serve as the cornerstone of our success, shaping our interactions both within the NHFC and with our stakeholders.1

The Code of Conduct and Ethics outlines expectations for all employees and all external stakeholders, regardless of position, tenure, or relationship with the NHFC respectively. We expect all to act with honesty and integrity and adhere to legal and regulatory requirements thereby inculcating a strong code of conduct and ethics culture in the company.

It is also imperative that all the NHFC internal and external stakeholders familiarise themselves with NHFC Code of Conduct and Ethics procedures and follow them diligently. They are designed to ensure compliance with applicable laws, regulations and NHFC Values.

The NHFC also encourages open communication and transparency. If colleagues become aware of behaviour that violates our Code of Conduct and Ethics or policies, I urge you to report it through the appropriate channels without fear of retaliation.

We are all stewards of the NHFC's reputation and each of us plays a crucial role in upholding these principles. By embracing our Code of Conduct and Ethics, we foster a culture of trust, and accountability and we reinforce our commitment to sustainable growth and ethical business practices.

Together, we will continue to uphold the highest standards of conduct and set a positive example for others in our environment.

Thank you for your ongoing commitment to excellence and a high-performing culture.

Sincerely,

Ozola



## 10.1 STATEMENT OF **INTENT**

The NHFC/HSDB promotes a culture of trust and commitment to building ethical relationships with the public and all internal and external stakeholders. The spirit of NHFC/HSDB Values is encouraged throughout NHFC/HSDB business dealings and interaction with all stakeholders.

## 10.2 **OBJECTIVES**

The Code of Conduct and Ethics ("Code") acts as a guideline to all employees on how to conduct themselves both in their relationship with each other, as well as in the way they relate to other stakeholders. Compliance with the Code is expected to enhance professionalism and help ensure confidence in the NHFC/HSDB.

Furthermore, the Code provides guidance to employees on behaviour/actions to avoid conflicts

of interest when they encounter such, as well as to guide them in their personal conduct in public and private life, while they work for the NHFC/HSDB.

The primary purpose of the Code is a positive one, viz. to promote desirable exemplary conduct in line with the code of ethics policy and the NHFC/HSDB values. Contravention of any provision of the Code or failure to comply with any of its provisions by an employee, is subject to the NHFC/HSDB disciplinary measures.

## 10.3 **SCOPE**

This Code applies to the following persons:

- 10.3.1 All officials/employees of the NHFC/HSDB.
- 10.3.2 The Board of Directors
- 10.3.3 Any person associated with the NHFC/HSDB in the delivery of its Mandate such as suppliers, contractors, consultants, etc.

## 10.4 GLOSSARY OF **TERMS**

TERM/ ABBREVIATION	DEFINITION
Accountability	Means being willing to answer for the execution of responsibilities, even when delegated, and being held accountable for such actions.
Client	Means a person or company that receives a service from the NHFC/HSDB in return for payment.
Code of Ethics	Means a set of principles of conduct within the organisation that guide decision making and behaviour.
Collaboration	Means two or more people working together to create or achieve a common goal.
Competence	Means taking steps to ensure there is sufficient working knowledge of the organisation, the industry, as well as the laws, rules, codes, and standards applicable; continually developing leadership competence; acting with due care, skill, and diligence; and taking reasonable steps to be informed about matters for decision making.
Conflict of interest	Occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise his or her judgement, decisions, or actions in the workplace.
Decision matrix/tree	Means a structure in the decision model which helps in drawing a conclusion for any problem which is more complex in nature.
Declaration of interest	Means to officially state that you are connected with someone or business.
Diversity	Means the practice or quality of including or involving people from a range of different social and ethnic backgrounds and of different genders, sexual orientations, etc.
Employee	Means a person employed by the NHFC/HSDB.
Ethics	Means establishing an ethical culture, which refers to attitudes and behaviours of being honest and always doing the right thing.
Ethical culture	Means attitudes and behaviours of being honest and always doing the right thing.
Excellence	Means the quality of being outstanding or extremely good.

## 10.4 GLOSSARY OF TERMS CONT.

TERM/ ABBREVIATION	DEFINITION
Fairness	Means impartial and just treatment or behaviour without favouritism or discrimination.
Innovation	Means make changes in something established, especially by introducing new methods, ideas, or products.
Integrity	Means acting in good faith in the best interests of the organisation; avoiding and/or managing conflicts of interest appropriately; acting beyond mere legal compliance; and setting the tone for ethical culture in the organisation.
Leadership	Means ability of an individual, group or organization to "lead", influence or guide other individuals, teams, or entire organizations
Professionalism	Means the conduct, aims or qualities that characterize the competence or skills expected of a professional.
Remunerative work	Means a job or work people get paid for.
Responsibility	Means taking responsibility for the roles of the governing body through exercising courage; taking risks and seizing opportunities in the best interests of the organisation; anticipating, preventing, and ameliorating the negative outcomes of the organisation's activities/outputs; and the effective preparation, attendance, and participation at meetings.
Service provider	Means an individual or entity that provides services to the NHFC/HSDB.
Harassment	Unwanted conduct which impairs dignity, it creates a hostile and intimidating working environment, has the effect of inducing submission by actual or threatened adverse consequences.
Sexual Harassment	Means unwanted conduct of a sexual nature, the use of explicit or implicit sexual overtones, including the unwelcome physical, verbal, or non-verbal conduct.
Supplier	Means the person or firm from whom the Company contracts to purchase the Goods and/or the Services.

Transparency

responsibilities are exercised.

Means being transparent in the way governance roles and

#### 10.4 GLOSSARY OF **TERMS CONT.**

#### **TERM/ ABBREVIATION**

#### Ubuntu

#### **Unethical behaviour**

#### **Values**

#### **DEFINITION**

Means a quality that includes the essential human virtues; compassion and humanity. I ambecause we are ("Umuntu ngumuntu ngabantu").

Means action that falls outside of what is considered morally right or proper for a person.

Mean basic and fundamental beliefs that guide or motivate attitudes or actions.



## 10.5 GOVERNANCE OF CODE OF CONDUCT AND ETHICS

10.5.1 The role of the Board of the NHFC/HSDB is to:



10.5.1.1 Ensure the governance of ethics is in place and setting the direction on how such is to be implemented in the organisation.



10.5.1.2 Approving appropriate code of conduct and ethics policies which articulate and give effect to the implementation of ethics in the organisation.



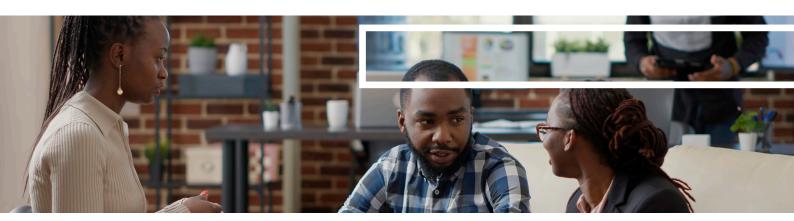
10.5.1.3 Ensure that the code of conduct and ethics policies encompass interaction with both internal and external stakeholders as well as broader society and address key ethical risks of the organisation.

## 10.6 THE ROLE OF **EXECUTIVE MANAGEMENT** IS TO:

- 10.6.1 Develop the Code of conduct and Ethics, review and implementation thereof.
- 10.6.2 Develop frameworks, procedures, and processes to ensure compliance with the code of conduct and ethics.
- 10.6.3 Ensure that employees and stakeholders familiarise themselves with the code of conduct and ethics policies.
- 10.6.4 Assume responsibility for implementation and execution of the Code.

## 10.7 INTERNAL /EXTERNAL AUDIT

Internal audit shall provide independent assurance on the adequacy and effectiveness of the control environment of the NHFC/HSDB in implementing the Code.



## 10.8 NHFC VALUES

The Code of Conduct and Ethics is guided by the core Values which set the tone for the culture within the NHFC. Any conduct contradicting the core values of the NHFC, which are underpinned by the spirit of ubuntu, professionalism which produces excellence, recognition of our diversity, integrity, collaboration with stakeholders and teamwork which ensures efficient service delivery of innovative housing financial products to the much deserving South African public, will not be tolerated.

The core values acronym ACE LII DUP is defined below as follows:



## 10.8 NHFC VALUES CONT.



**ACCOUNTABILITY** - We promise to act responsibly in delivering our products and service by recognising the public's right to have access to responsive, adequate and effective service delivery.



**COLLABORATION** - We pledge to collaborate with our stakeholders to improve the housing needs of South Africans through effective communication.





**LEADERSHIP** - We devote ourselves to servant leadership by putting the stakeholders and the needs of the public first through effective communication, taking responsibility for our own action and making the right decisions.





**INNOVATION** - We believe in forward looking, fresh thinking in creating new and improved products and service delivery.





**UBUNTU** - We respect our employees and all stakeholders, we show compassion, empathy, and humility in the diversified communities we serve.



PROFESSIONALISM - We are reliable, consistent, and competent in our interaction with stakeholders and in the delivery of the housing products and services to the public.



THE CODE OF CONDUCT AND ETHICS IS **GUIDED BY THE CORE VALUES** WHICH SET THE TONE FOR THE CULTURE WITHIN THE NHFC.

## 10.9 EXPECTED EMPLOYEE BEHAVIOUR

#### WITH STAKEHOLDERS

- 10.9.1 In a scenario where an employee is interacting with a fellow employee, he/she must:
  - 10.9.1.1 Act professionally and co-operate fully to advance the public interest.
  - 10.9.1.2 Execute all reasonable instructions by persons officially assigned to give them, provided these are not contrary to the provisions of the constitution and/or any other law.
  - 10.9.1.3 Avoid conflicts of interest, including entertaining proposals and requests from relatives and friends in work-related activities.
  - 10.9.1.4 Never abuse her or his authority or influence another employee, nor be influenced to abuse her or his authority.
  - 10.9.1.5 Use the appropriate channels to air her or his grievances or to direct representations.

- 10.9.1.6 Commit to the optimal development, motivation and utilisation of his/her staff and the promotion of sound labour and interpersonal relations.
- 10.9.1.7 Deal fairly, professionally, and equitably with other employees, irrespective of race, gender, ethnic or social origin, colour, sexual orientation, age, disability, religion, political persuasion, conscience, belief, culture or language.
- 10.9.1.8 Refrain from party political activities in the workplace.

## 10.10 IN HAVING A RELATIONSHIP AND **INTERACTION**WITH THE PUBLIC AN EMPLOYEE SHOULD:

- 10.10.1 Promote the unity and well-being of the south african nation in performing her or his duties.
- 10.10.2 Serve the public in an unbiased and impartial manner to create confidence in the NHFC/ HSDB.
- 10.10.3 Be polite, helpful, and reasonably accessible in her or his dealings with the public, always treating members of the public as customers who are entitled to receive high standards of service.
- 10.10.4 Have regard for the circumstances and concerns of the public in performing her or his official duties and in making decisions affecting them.
- 10.10.5 Be committed through providing timely service to the development and upliftment of all south africans.

- 10.10.6 Not unfairly discriminating against any member of the public on account of race, gender, ethnic or social origin, colour, sexual orientation, age, disability, religion, political persuasion, conscience, belief, culture, or language.
- 10.10.7 Does not abuse her or his position in the NHFC/HSDB to promote or prejudice the interest of any political party or interest group.
- 10.10.8 Respect and protects every person's dignity and her or his rights as contained in the constitution.
- 10.10.9 Recognize the public's right of access to information, excluding information that is specifically protected by law.

## 10.11 IN THE INTERACTION WITH SUPPLIERS, SERVICE PROVIDERS AND CONSULTANTS, AN EMPLOYEE SHOULD:

10.11.1

Ensure compliance with the procurement policies and other NHFC/HSDB related policies. 10.11.2

Not get involved in dealings that would be in breach of the NHFC/HSDB values and the code of conduct and ethics.

## 10.12 **PERFORMANCE** OF DUTIES

In the execution of his/her duties, the employee -

- Strives to achieve the objectives of her or his 10.12.1 institution cost-effectively and in the public's interest.
- 10.12.2 Seeks innovative ways to solve problems and enhances effectiveness and efficiency within the context of the law.
- 10.12.3 Is punctual in the execution of her or his duties.
- 10.12.4 Executes her or his duties in a professional and competent manner.
- 10.12.5 Does not engage in any transaction or action that conflicts with or infringes on the execution of her or his official duties.
- 10.12.6 Will recuse herself or himself from any official action or decision-making process which may result in improper personal gain, and this should be properly declared by the employee.
- 10.12.7 Accepts the responsibility to avail herself or himself for ongoing training and selfdevelopment throughout her or his career.
- 10.12.8 Is honest and accountable in dealing with public funds and uses the nhfc/hsdb's property and other resources effectively, efficiently, and only for authorised official purposes.
- 10.12.9 Promotes sound, efficient, effective, transparent, and accountable administration.
- 10.12.10 Gives honest and impartial advice, based on all available relevant information, to a higher authority when asked for assistance of this kind.



## 10.13 COMPANY INFORMATION AND RESOURCES

In handling of company information and resources an employee should:

- 10.13.1 Honour the confidentiality of matters, documents, and discussions, classified, or implied as being confidential.
- 10.13.2 Not use or disclose any official information for personal gain or the gain of others.
- 10.13.3 Not conduct business for own or others' account, using the Company's time and/or resources.
- 10.13.4 Not run down the reputation or good name of the company within the organisation or externally.
- 10.13.5 Not be in possession of any confidential or proprietary information without prior written authorisation.

## 10.14 RULES AROUND **ASSAULT AND VIOLENCE**

Assault and violence include the following and should be prohibited:

- 10.14.1 Actual or attempted physical violence towards persons or destruction of, or damage to property.
- 10.14.2 Victimisation, intimidation, threats or menacing behaviour or action.
- 10.14.3 Carrying, possessing, or using firearms, ammunitions or any other potentially dangerous weapon or devices on company property.
- 10.14.4 Inciting other persons to violence, disobedience or to breach rules, regulations, procedures or agreements.

## 10.15 HARASSMENT ENVIRONMENT

- 10.15.1 The existence of a context of harassment
- 10.15.2 The circumstance of the complainant
- 10.15.3 The impact that the conduct has had on an employee.
- 10.15.4 The respective position of the harasser/perpetrator and the complainant



## 10.16 RULES AROUND ALCOHOL AND NARCOTICS

The following conduct is NOT permitted from NHFC/HSDB Employees:

- 10.16.1 Possessing, trading, using or being under the alleged influence of any alcoholic or narcotic substance during working hours.
- 10.16.2 Being unfit to perform duties because of allegedly being under the influence of alcohol or any other narcotic substance.
- 10.16.3 Driving any company vehicle or operating any company machinery or equipment whilst allegedly being under the influence of alcohol or any narcotic substance.



## 10.17 COMPANY INFORMATION AND RESOURCES

In handling of company information and resources an employee should:



#### 10.17.1

Be faithful to the Republic and to abide and honour the Constitution of the Republic of South Africa in the execution of her or his daily tasks.



#### 10.17.2

Put the public interest first in the execution of her or his duties.



#### 10.17.3

Strive to be familiar with and abide by all statutory and other instructions applicable to the conduct of her or his duties.



#### 10.17.4

Co-operate with public institutions established under legislation and the Constitution in promoting the public interest.



#### 10.17.5

During official duties in public, dress and behave in a manner that does not put the reputation of the NHFC/HSDB into disrepute.

## 10.18 ENTERTAINMENT, HOSPITALITY AND GIFTS

An employee must ensure that entertainment, hospitality, business lunches, small tokens of appreciation or inexpensive mementos offered to them in conducting the Corporation's business meet the following criteria:

- 10.18.1 Declare any entertainment, hospitality, and gifts in writing to his/her Line Manager within three business days of receiving any gifts.
- 10.18.2 Notify the Ethics officer for gift register record keeping.
- 10.18.3 Where Executive Managers are concerned, the gift must be declared to and recorded by the Company Secretary. Details of the gift such as the nature, source and amount of the entertainment, hospitality or gift should be declared.
- 10.18.4 Payments in cash (such as retail vouchers) of whatever amount may not be accepted under any circumstances.
- 10.18.5 Employees must not offer any personal favour or other preferential treatment to anybody which might place the recipient under obligation.
- 10.18.6 It is incumbent upon the employee to establish the client's criteria on receiving of gifts, hospitality, or other favours and to observe the client's practices in this regard.

### 10.19 **CONFLICT OF INTEREST**

A conflict of interest occurs when an employee's personal interests such as family, friendships, financial, or social factors – could compromise his or her judgment, decisions, or actions in the workplace.

The employees shall ensure that interest/remunerative work/commitment performed outside the NHFC/HSDB is not in conflict with their duties. Employees must conduct themselves in an ethical manner in line with the NHFC/HSDB values and code of conduct and ethics to ensure that:

- 10.19.1 No employee performs or engages himself or herself in possible or perceived conflict of interest or to perform remunerative work outside his or her employment in the NHFC/HSDB, without prior completion and authorisation of the other remunerative work form. [This includes and is not limited to, executive directorship, non-executive directorship, marketing and selling of products such as Tupperware, perfume, and c osmetic products, business interest etc.].
- 10.19.2 The NHFC/HSDB is afforded an opportunity to consider whether the outside work could reasonably be expected to interfere with or impede the effective or efficient performance of the employee's functions in the organisation or constitute a contravention of the code of conduct and ethics.
- 10.19.3 All NHFC/HSDB employees will be required to declare any outside interest/remunerative work/commitment in line with the code of conduct and ethics by completing the declaration of interest form. The NHFC will not tolerate any form of dishonesty in reporting. Should the NHFC suspect dishonesty, the company will undertake an investigation on the matter in question.
- 10.19.4 All employees are required to complete a declaration of interest form in April the beginning of the financial year or when a change occurs.

The **remunerative work** form and the **declaration of interest form** are available on the intranet.

## 10.20 **DECISION MATRIX**

The Code of Conduct and Ethics does not and cannot cover every possible situation an employee may face in the organisation as they make ethical decisions. Therefore, if an employee comes across an ethical situation or dilemma that is not covered in the code of conduct and ethics and schedule of offences, they are encouraged to utilise the ethics decision matrix to ask themselves several simple questions that determine if the decision is in line with the NHFC/HSDB Code of Conduct and Ethics. The decision matrix is available on the intranet.

## 10.21 ETHICS OFFICE

For any ethics advise or complaints, employees can email the Ethics Office on ethicsvoice@nhfc.co.za.



## 10.22 **BREACH** OF THE CODE OF CONDUCT AND ETHICS

Deviation from the principles laid down in this code of conduct and ethics will be subject to disciplinary action in terms of the NHFC/HSDB's disciplinary process and procedure.

## 10.23 **DIRECTORSHIPS** OF EXTERNAL COMPANIES

Employees may hold directorships based on the following conditions: That such directorships are nonexecutive:

10.23.1	An existing employee should submit a
	written request prior to taking up any
	directorship, and receive a written approval
	which addresses the criteria below, to his/her
	Line Manager:

10.23.1.2	Whether	the	directorship
	constitute a	a conflict	t of interest.

10.23.1.3	Whether th	ne director	ship	has	а
	significant	impact	on	th	ne
	employee's	work load	and	abili	ty
	to perform h	nis\her dut	ies; ar	nd	

10.23.1.5	An	em	O	uties	
	and	respor	nsibilities	to	the
	Corpo	oration	will		take
	absol	ute pre	ecedence	over	any
	requi	rements	s impose	d by	any
	external directorship.				

10.23.2 Non-executive directorship should be limited to no more than two nondirectorship positions.

10.23.3 Should the non-executive directorship be held with any State-Owned Enterprise, the employee must disclose to the entity his/her employment with NHFC/HSDB.

## 10.23 **DIRECTORSHIPS** OF EXTERNAL COMPANIES CONT.

- 10.23.4 Should the employee be remunerated for their non-executive directorship, such remuneration must be declared to the Corporation unless, it is done outside the employee's normal working hours.
- 10.23.5 The approval of the Chair of the Board should be obtained in instances where the CEO takes up a new directorship.
- 10.23.6 A new employee should submit a list of his/her directorships to his/her Line Manager upon joining the Corporation, who should in turn submit it to HR. A written approval must be sought.
- 10.23.7 The CEO must in deciding, be satisfied that the directorship will not interfere with the employees' responsibilities.
- 10.23.8 Employees holding a directorship of benefit to the Corporation's business or who acts as an observer on a client's board:

- 10.23.8.1 An employee, representing the NHFC/HSDB as a director on another entity's board or acts an observer on client's board must always act in the best interest of that entity and maintain the ethical principles and behavioral standards as set out in King IV on director's duties responsibilities.
- 10.23.8.2 An employee falling in the above category may attend board meetings during office hours and the NHFC/HSDB will carry all travel, accommodation, and other expenses if it is not covered by the other entity. Such an employee would not receive any remuneration as an observer.

## 10.24 **EXTERNAL ACTIVITIES** (E.G. RELIGIOUS, SPORT, CULTURAL)

An employee may engage in outside activities outside office hours but may not use the NHFC/HSDB's resources for this purpose. Such activities may not interfere with the employee's ability to perform his\her duty to the best of his\her ability.



### 10.25 **CONFIDENTIALITY**

10.25.1 An employee is legally bound to maintain the confidentiality of all information and records that are the NHFC/HSDB's property and must in doing so:

> 10.25.1.1 Utilise any information acquired by virtue of his/her office only for the purposes of furthering the interests of the NHFC/HSDB and not for his/her own personal gain nor for the benefits of any other person.

> 10.25.1.2 Not do or say anything which might be construed as damaging the credibility or integrity of the NHFC/HSDB.

> 10.25.1.3 Ensure that confidential information relating customers, employees and the NHFC/HSDB's operations is not given inadvertently or deliberately to third parties.

10.25.1.4 Ensure that information provided to the NHFC/HSDB by any of its clients, relating to a particular transaction, is treated confidential, unless the client has agreed in writing to the dissemination of the information.

10.25.1.5 An employee may disclose confidential information in the following instances:

> 10.25.1.5.1 If the nature of his/her duties requires it;

> 10.25.1.5.2 If he\she is mandated by his\her manager prior to making information available; and

> 10.25.1.5.3 If he/she is giving evidence in a court of law



AN EMPLOYEE IS LEGALLY BOUND TO MAINTAIN THE CONFIDENTIALITY OF ALL **INFORMATION AND RECORDS** THAT ARE THE NHFC/HSDB'S PROPERTY.

## 10.26 **CONDUCT OF BUSINESS** ON BEHALF OF THE NHFC/HSDB

10.26.1 Employees must always comply with all applicable laws, codes of good practice and regulations that relate to their work activities for and on behalf of the Corporation.

10.26.2 Employees shall neither commit nor condone any violation of the law or unethical business dealings and shall not engage in any illegal or improper conduct. Failure to comply will be subject to disciplinary action.

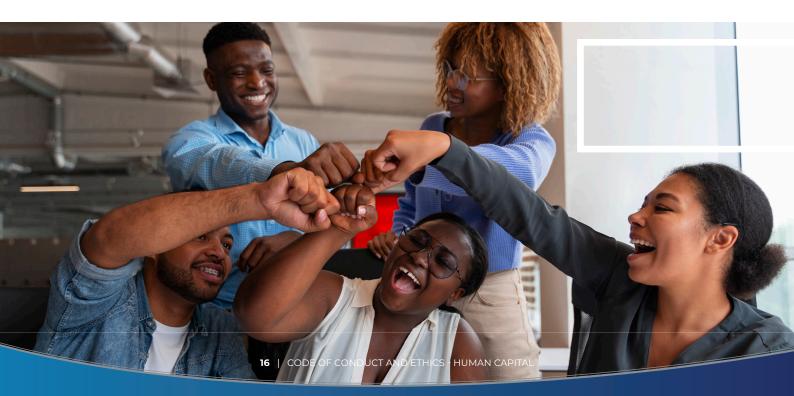
### 10.27 POLITICAL ACTIVITY

The NHFC/HSDB respects the right of association with a political party. Employees may however not speak on behalf of the Corporation and political activities may not be conducted during working hours.

## 10.27 REPORTING UNETHICAL CONDUCT

- 10.27.1 All employees are required to report all workplace dishonesty, malpractices, misconduct, and wrongdoing to Tip-Off Anonymous at 0800 004 834 or e-mail NHFC/HSDB@tip-offs.com.
- 10.27.2 An employee who reports a breach of the Policy or unethical conduct by a fellow employee will be protected against reprisal by the Protected Disclosure Act, if such disclosure is made in good faith.
- 10.27. The NHFC/HSDB is afforded an opportunity to consider whether the outside work could reasonably be expected to interfere with or impede the effective or efficient performance of the employee's functions in the organisation or constitute a contravention of the code of conduct and ethics.
- 10.27.4 All NHFC/HSDB employees will be required to declare any outside interest/ remunerative work/commitment in line with the code of conduct and ethics by completing the declaration of interest form. The NHFC will not tolerate any form of dishonesty in reporting. Should the NHFC suspect dishonesty, the company will undertake an investigation on the matter in question.
- 10.27. All employees are required to complete a declaration of interest form in April the beginning of the financial year or when a change occurs.

All employees are required to report all workplace dishonesty, malpractices, misconduct, and wrongdoing to Tip-Off Anonymous at 0800 004 834 or e-mail NHFC/HSDB@tip-offs.com.





## **THANK YOU**

https://www.nhfc.co.za





