

Huge Connect Pty Ltd
Code of Ethics

1 Preamble

- 1.1 The purpose of this Code of Ethics is to commit Huge Connect and its employees to the highest standards of ethical conduct.
- 1.2 This Code comprises a short, aspirational summary outlining Huge Connect's core ethical values, and principles and as well as specific directions in terms of which it forbids specific behaviour. This Code is therefore both "value-based" and "rule-based".
- 1.3 This Code provides guidelines for all employees to do the right thing and behave at high ethical standards all the time.
- 1.4 Huge Connect commits itself to maintaining in all of its activities at the highest standard of competence, integrity and ethical behaviour and is committed to being a law-abiding corporate citizen as well.
- 1.5 This Code is wholly supported by the Board and senior management of Huge Connect.

2 Application and Purpose of the Code

- 2.1 This Code applies to Huge Connect as whole and every Huge Connect employee shares the responsibility of upholding this Code.
 - 2.1.1 For this reason, this Code uses the word "we", "you" and Huge Connect interchangeably and which also indicates that Huge Connect is more than a juristic person, but rather an entity, which together with its shareholders, management and each and every employee, has a moral and ethical persona which is reflected in all of its operations and business activities.
- 2.2 Ethics involve applying acceptable moral standards – standards of good, right, and fair conduct, supported by values upon which decisions and actions of individuals within Huge Connect are founded, to achieve Huge Connect's business objectives and maintain Huge Connect's public reputation (one of Huge Connect's most important assets).
- 2.3 In simple terms it is about "doing the right thing".
- 2.4 The purpose of this Code of Conduct is to provide a practical guide to decision making and to commit Huge Connect and its employees to certain specific ethical behaviour.

- 2.5 In support of this Code, Huge Connect has developed and implemented internal policies and procedures to guide conduct and enforce compliance to minimum standards. These standards are designed to be in accordance with South African legislation, regulations and industry practices.
- 2.6 Any problem and/or difficulties in the implementation, maintenance and/or interpretation of the Code must be referred to Huge Connect's Ethics Committee.

3 Commitment

- 3.1 Huge Connect has adopted and implemented the values of **Integrity, Respect, Accountability, Professionalism and Passion** in all of its business operations.
- 3.2 These values, together with the behaviours identified for each of them below, provide general guidance to Huge Connect employees as to the way they must conduct themselves and interact with each other and all of Huge Connect stakeholders.
- 3.3 Huge Connect recognises its obligations to all stakeholders – particularly shareholders, employees, business partners, regulatory authorities and the wider society.
- 3.4 Huge Connect is committed to maintain the trust and confidence of all its stakeholders and this is also the responsibility of every employee.
- 3.5 This Code is supported by other company policies and procedures relating to specific issues, processes and situations.
- 3.6 Huge Connect shall monitor ethical performance regularly to ensure that irregular or unethical business practices and behaviour are addressed and eliminated.

4 Core Values and Principles

- 4.1 **Integrity** means that we are honest, trustworthy and reliable, that we practise and encourage open and honest communication with all our colleagues and other Huge Connect stakeholders, and that we are responsible for all our actions. Ultimately, integrity is based on values rather than personal gain and is practised even if nobody is watching.
- 4.2 **Respect** means that you accept somebody for who they are, even when they're

different from you or you don't agree with them. Respect in your relationships builds feelings of trust, safety, and wellbeing. Respectful behaviour includes inter alia to attentively listen to others, respond appropriately to what they have to say, work effectively with diverse people and be willing to learn from others.

4.3 **Accountability** is the readiness or preparedness to give an explanation or justification for one's judgements, decisions, and actions as well take responsibility for failures and errors. Accountability includes the ethical concept "Responsibility" that refers to the fact that individuals have morally based obligations and duties to others, i.e., we must be prepared to take responsibility for our work, make commitments and keep to such commitments, find solutions and be held accountable for delivery and results.

4.4 **Professionalism** means the skill, good judgment, and polite behaviour that is expected from a person who is trained to do a job well and is commonly understood as an individual's adherence to a set of standards and/or laws, code of conduct or collection of qualities that characterize accepted practice. We must therefore always act with the necessary skill, care and diligence required within Huge Connect and the industry that it operates in, and that we must understand and comply with all applicable law, rules and regulations and the codes of conduct issued by the regulatory authorities that govern us.

4.5 **Passion** means that we are enthusiastically devoted to the achievement of Huge Connect's mission, vision and goals. We are also dedicated to excellence and committed and excited to work towards improving our own and others' lives.

5 **Decision-making**

5.1 Practical decision-making often requires the balancing of competing interests, particularly when dealing with unforeseen circumstances.

5.2 This means we need to balance the interests of our key stakeholders when making decisions in accordance with our values.

5.3 No particular value or stakeholder has priority over another and competing interests should be considered holistically and in the context of all the values and stakeholder interests in order to obtain the most appropriate outcome.

5.4 Where there is any question regarding the ethics associated with a contemplated decision or action, every employee should follow the guidelines below:

5.4.1 Is this decision/action legal?

5.4.2 Are you acting in terms of the conditions of your employment contract?

5.4.3 Does this decision/action comply with our policies and procedures?

5.4.4 Is this decision/action consistent with our ethical values and standards?

5.4.5 Does this decision/action feel right?

5.4.6 Would you be happy if your manager, supervisor or colleagues knew about this decision/action?

5.4.7 Would you be happy to have this decision/action published on the front page of the newspaper?

5.4.8 Would you repeat this decision/action in front of other people, i.e., if somebody else was watching you?

5.4.9 If the answer to all these questions is an unqualified “yes”, then it is likely that the particular decision or action is in accordance with our values and behaviours.

5.4.10 ‘In the event of uncertainty as to the most appropriate course of action, it is recommended that guidance should be obtained from senior management.

6 Behaviour:

6.1 With the above practical guidance in mind, we aspire to abide by the following code of conduct when dealing with our stakeholders:

6.1.1 For our Shareholders we will:

6.1.1.1 Maintain executive accountability for decision making on material matters;

6.1.1.2 Take reasonable steps to protect and enhance Huge Connect’s assets;

6.1.1.3 Comply with legislation, industry regulations and prescribed practices;

6.1.1.4 Produce accurate and timely accounting statements and shareholder information;

6.1.1.5 Report developments that may have a material impact on the value of Huge

Connect's shares;

6.1.1.6 Conduct business honestly, fairly and responsibly; and

6.1.1.7 Ensure that no contributions will be made to political parties.

6.1.2 For our Customers we will:

6.1.2.1 Act justly, fairly and in the best interests of each customer;

6.1.2.2 Render a responsible, effective, and competent service;

6.1.2.3 Constantly strive to improve the quality of our products and services;

6.1.2.4 Build trusting relationships with them;

6.1.2.5 Deal with complaints and enquiries in a prompt and Huge Connect manner;

6.1.2.6 Report accurately on our performance and prospects;

6.1.2.7 Strive to deliver consistent performance;

6.1.2.8 Uphold the letter and spirit of agreements we are party to;

6.1.2.9 Protect the confidentiality of information in accordance with the law and prescribed practices;

6.1.2.10 Communicate in an open, clear, timely, honest, and transparent manner;

6.1.2.11 Ensure a positive experience in doing business with us; and

6.1.2.12 Endeavour to always treat them fairly.

6.1.3 As an Employer we will:

6.1.3.1 Respect the dignity of each employee;

6.1.3.2 Act justly, fairly, and impartially;

6.1.3.3 Respect the right to freedom of association and expression;

6.1.3.4 Keep our employees' personal details confidential;

6.1.3.5 Respect the tradition and culture of all our employees;

6.1.3.6 Recruit and promote employees in accordance with established labour law and practice;

- 6.1.3.7 Develop skills and competencies of employees in line with the needs of Huge Connect's operational and business needs;
- 6.1.3.8 Create an environment of continuous learning as a way of training and developing employees;
- 6.1.3.9 Create new challenges and career opportunities for employees by developing and growing the Huge Connect business;
- 6.1.3.10 Communicate in an open, transparent, honest and timely fashion;
- 6.1.3.11 Not overstate or exaggerate in any communication to employees;
- 6.1.3.12 Not allow any unlawful discrimination, intimidation, victimisation or harassment of employees;
- 6.1.3.13 Create the climate and opportunity to report concerns and irregularities safely and without fear of retribution or victimisation;
- 6.1.3.14 Deal with employee complaints and enquiries promptly ~~and Huge Connect ly~~;
- 6.1.3.15 Maintain sound and fair labour practices and apply codes of good practice;
- 6.1.3.16 Promote the principle of internal equity and take account of market trends when determining the pay levels of our employees; and
- 6.1.3.17 Provide a healthy and safe working environment.
- 6.1.4 As Employees we will:
 - 6.1.4.1 Act in the best interests of Huge Connect and our customers;
 - 6.1.4.2 Maintain the confidentiality of customers and business partners;
 - 6.1.4.3 Communicate objectively, truthfully and accurately;
 - 6.1.4.4 Not overstate or exaggerate in any communication;
 - 6.1.4.5 Protect and enhance Huge Connect's assets and business;
 - 6.1.4.6 Maintain Huge Connect 's reputation in accordance with our values;
 - 6.1.4.7 Respect the tradition and culture of all people;
 - 6.1.4.8 Not comment unfavourably on the products, management, or operations of

competitors;

- 6.1.4.9 Take accountability for our decisions;
 - 6.1.4.10 Deal with complaints and enquiries promptly;
 - 6.1.4.11 Produce and maintain accurate records where required;
 - 6.1.4.12 Embrace continuous learning as a way of working and developing ourselves;
 - 6.1.4.13 Acknowledge differences and work together to create solutions;
 - 6.1.4.14 Recognise that individual and corporate success is dependent on teamwork;
 - 6.1.4.15 Always conduct ourselves in a professional and courteous manner;
 - 6.1.4.16 Not hold a political office that would influence our normal day to day work for the company;
 - 6.1.4.17 Behave in a way that will result in us conducting ourselves with dignity, integrity and credibility, whether acting in a professional or personal capacity; and
 - 6.1.4.18 Not misuse our positions and/or the purchasing power of Huge Connect to obtain goods, materials or services for personal use or benefit on terms that are not available to the general public or to all other employees.
- 6.1.5 For our Business Partners we will:
- 6.1.5.1 Conduct our business in an ethical and professional manner;
 - 6.1.5.2 Uphold the letter and spirit of contracts and agreements;
 - 6.1.5.3 Build long term relationships based on honesty and fairness;
 - 6.1.5.4 Compete fairly and not engage in unlawful market conduct;
 - 6.1.5.5 Maintain the confidentiality of our business partners;
 - 6.1.5.6 Protect personal information of our partners from unauthorised use;
 - 6.1.5.7 afford suppliers of goods, services and capital fair opportunity to compete for the Group's business on the grounds of capability, competitive pricing, quality and service;
 - 6.1.5.8 Maintain transparent sourcing- and ethical procurement practices.

- 6.1.6 In our interactions with Government and Regulatory Authorities we will:
 - 6.1.6.1 Act according to the letter and spirit of South Africa's Constitution and comply with all laws and regulations;
 - 6.1.6.2 Provide accurate information where required and justified;
 - 6.1.6.3 Honour our licence and tax obligations;
 - 6.1.6.4 Declare all taxable benefits to which employees are entitled
 - 6.1.6.5 Pay our licence fees;
 - 6.1.6.6 Ensure that persons in public office are not improperly influenced; and
 - 6.1.6.7 Ensure that no contributions are made to political parties.

7 Ethics Management Structure

7.1 The Managing Director

- 7.1.1 The Managing Director has overall responsibility for ensuring that this Code of Ethics is complied with.

7.2 The Ethics Committee

- 7.2.1 In Consultation with the Ethics Committee the Managing Director must ensure that adequate processes are in place to ensure compliance with this Code as far as reasonably practicable and evaluate the efficacy of this Code on a regular basis.

7.3 Management:

- 7.3.1 Management at all levels are obliged to lead by example in as far as their behaviour at all times is concerned.

7.4 Employees:

- 7.4.1 All employees are expected to be familiar with their role and duties and Huge Connect's internal policies and procedures, as failure to comply with them may be considered to be misconduct and employees may be subject to disciplinary action that could lead to dismissal.

8 Reporting of Unethical Behaviour

- 8.1 Unethical behaviour must be reported in writing to the Ethics Committee by email to ethics@hugeconnect.co.za or to a member of senior management, who must report such to the Managing Director and/or the Ethics Committee as soon as practicable.
- 8.2 Huge Connect respects the right of an individual to retain their anonymity when reporting non-compliance with this Code of Ethics.
- 8.3 The Code is not intended to comprise an exhaustive list of what constitutes ethical conduct, nor is it intended to contain a comprehensive list of offences or contraventions on which Huge Connect will take appropriate legal action.