



MANDALA CONSULTING
INTEGRATION FOR SUSTAINABILITY

Code of Ethics



MANDALA CONSULTING
INTEGRATION FOR SUSTAINABILITY

Purpose and scope of this code:

The purpose is to promote and enforce ethical business practices and standards in the Company. It forms an integral part of the Company's expectations of all its directors and employees. Acceptance of employment with the Company is deemed to be an acceptance of this code in its entirety.

The code is intended for use to raise ethical awareness and also as a guide for decision making. It is also used in training programmes and to assure customers, suppliers, competitors and all other stakeholders of the integrity of the Company with which they interact.

Our pledge

To our Shareholders:

We aim

- To protect and enhance the company's assets in the interests of all shareholders.
- To ensure compliance with all legislation governing the organisation.
- To produce accurate and timely accounting statements.
- To report any developments that may have a material impact on the value of the shareholder's assets.
- To generate an attractive return to investors on a long-term basis.
- To communicate business policies, achievements and prospects with honesty and integrity.
- Not to participate in any form of bribery or corruption.

To the Community:

We aim

- To serve the community by providing our services efficiently and responsibly and to provide employment opportunities.



- To engage in meaningful development projects within the communities in which we operate.
- To protect the environment in the broadest sense and subscribe to sustainable development. We recognize that certain resources are finite and must be used responsibly.

To our clients:

We strive

- To render a responsible and effective service with integrity
- To give adequate, accurate information and refrain from uncompetitive behaviour.
- To deal with complaints and enquiries in a prompt and efficient manner.
- To protect the confidentiality of information, unless the needs of justice require otherwise.

To our Suppliers:

We strive

- For integrity in dealings with our suppliers as a prerequisite for successful long term business relationships.
- To avoid untruths, concealment and overstatement in our communications.
- To act in the best interests of the Company without any improper motives, when concluding contracts or accepting business for the organisation.
- To maintain the confidentiality of information received from suppliers.
- Not to participate in any form of bribery or corruption.

To our Employees:

We strive

- To respect the dignity of the individual.
- To provide a healthy and safe work environment.



- To comply with all relevant legislation including but not limited to the Occupational Health and Safety Act, Basic Conditions of Employment Act, The Labour Relations Act, and Skills Development Act.

Corporate governance compliance:

We strive

- To comply with and uphold all laws and corporate governance principles.
- To prevent unethical conduct.
- To compete fairly and not engage in restrictive trade practices or abuse any position of market dominance.
- To refrain from false or misleading advertising.
- To avoid discussing proprietary or confidential information in any contact with competitors.
- To prevent misrepresentation of our products and services.
- Not to acquire information regarding a competitor's business by disreputable means.

Stefan Viljoen
076 907 3277
Managing Director
Mandala Consulting Group (Pty) Ltd

10 August 2021



MANDALA CONSULTING
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Environmental Policy

The Mandala Consulting Group (Pty) Ltd is committed to the practice and management of its business in a manner compatible with the broader goals of the social, economic and natural environment and to the integration of environmental management into all its activities.

Environmental management will thus be regarded as a key performance area for all operational sites.

OBJECTIVES

- Promote the education, training and motivation of employees to raise their environmental awareness.
- Conduct the activities in an environmentally responsible manner.
- Execute environmental management systems on all operations, which include environmental auditing, and monitor these systems, where applicable.
- Ensure compliance with regulatory standards, environmental legislation, company policies and philosophy by means of environmental auditing.
- Develop and maintain positive relationships with clients, employees, all affected neighbours, government departments and the public.



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Forced Child Labour Policy

This child labour policy outlines the Company's commitment to ensuring all employees are of the local minimum employment age, mandatory school age or aged 15 years, whichever is higher.

Child labour is defined as work undertaken by a child which; the child is legally prohibited from undertaking or is likely to be harmful to the Child's health or physical, mental, spiritual, moral, or social development; or interferes with a child's education.

The Mandala Consulting Group (Pty) shall not employ children, directly or indirectly, under the age of 15 and children under the age of 15 shall not be present at the workplace.

Furthermore, should young persons between the ages of 15 and 17 seek employment, the Company shall ensure that this does not interfere with their school-going activities and that special mechanisms are in place to prevent, identify and mitigate any workplace related harms to young workers.

The Company shall ensure that young workers, under 18 years of age, are provided with work that is appropriate for their age. The Company shall take care to ensure that the work performed does not pose any risk to the well-being, education, physical or mental health and spiritual, moral or social development of the young worker.

In cases where child labour is found to be present at the workplace, the Company shall take appropriate measures to remediate the situation so as to prioritise the best interest of the child.



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Gifts / Bribery / Corruption Policy



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The Mandala Consulting Group (Pty) Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented. The Company has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with our employees. The Company will constantly uphold all laws relating to anti-bribery and corruption and adhere to the requirements in combating any form hereof.

To whom does this policy apply?

This policy applies to all employees, managers, and owners of The Mandala Consulting Group (Pty) Ltd, including temporary or contract employees. Employees must ensure that they do not become involved in any way in the payment of bribes. This policy sets out the minimum standards (South African Legislation, ILO conventions and recommendations, or any other relevant legislation that might be applicable) to which all employees of The Company must adhere at all times.

Definitions

Bribery can be described as: giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:

- * Gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
- * Payments, whether by employees or business partners such as recruiters, labour service providers or consultants; and
- * other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.

Company Commitment

All employees of The Mandala Consulting Group (Pty) Ltd must adhere to the company ethos of bribery and corruption. No employee or manager will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
- Attempt to mislead or induce any person to do something illegal or which goes against the company policy.



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- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- Violate any rules by shifting blame or responsibility onto another employee/person.
- Fraudulent practices against the company ethos or legislation.

The Mandala Consulting Group (Pty) Ltd is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers, or customers/clients in any way or form. This policy hereby binds the company to its commitment to regularly discuss and mitigate factors related to any form of bribery, corruption, or fraudulent behaviour.

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Grievance Procedure



WHAT IS A GRIEVANCE?

“Any dissatisfaction or feeling of injustice which is brought to the attention of management, but shall exclude dissatisfactions arising out of decisions in disciplinary actions.”

This procedure is drawn up to ensure official channels for consultation and is to be used where matters have developed into a grievance in order to:

1. Prevent individual or collective grievances from escalating into major disputes;
2. Provide employees with defined channels to air grievances;
3. Deal with grievance as quickly and as fairly as possible;
4. Eradicate the causes of genuine grievances.

STAGES OF THE PROCEDURE

Stage 1 - Immediate Supervisor / Manager

- ☐ The employee must lodge the grievance initially with his immediate supervisor or manager.
- ☐ The grievance must be lodged on the prescribed grievance form.
- ☐ The immediate supervisor or manager will endeavour to resolve the grievance within two (2) working days of it being lodged.

Stage 2 - Appeal to the Managing Director of the Operating Company

- ☐ Should the immediate Supervisor / Manager fail to resolve the grievance, the employee may within two (2) working days, lodge the grievance with the Managing Executive of the operating Company.
- ☐ The Managing Executive will endeavour to resolve the grievance within five (5) working days of the grievance form being received.
- ☐ The Managing Executive may consult with any or all of the parties involved in the grievance.

Stage 3 - Reference to Support Office

- ☐ If the grievance is not resolved during stage two then it will be referred by the responsible official at stage two to the HR Representative within two (2) working days for final consideration.
- ☐ At this level this official will normally be a member of the Group Executive Committee or any member of management to who he/she may delegate the responsibility to.
- ☐ The said official will consider all aspects of the grievance and take whatever steps he/she feels necessary to reach a satisfactory conclusion.
- ☐ This will involve him/her reviewing the initial grievance form filed by the staff member (s) and the action taken at each stage.
- ☐ It may, amongst other things, also necessitate him/her having discussions with the parties concerned and contacting the relevant members of the union if they were involved.
- ☐ If within five (5) working days of the grievance being referred to Support Office, no satisfactory solution has been achieved, the matter should be referred to an external body as stipulated by the Labour Relations act, 1996.

GUIDELINES IN DEALING WITH GRIEVANCES

The following guidelines will assist you in dealing with grievances effectively:

- ☐ Listen patiently to his/her complaint / grievance and allow the employee to state his/her case to the fullest extent, thereby affording him/her the opportunity of having been listened to.



- ☐ Remember that the employee regards the complaint / grievance important although you might not share the same sentiment. Encourage him/her to tell you all about it.
- ☐ Endeavour to resolve the complaint/ grievance as soon as possible. Such action will result in the employee having confidence not only in the system but also in you as a manager.
- ☐ Complaints / grievances solved rapidly and effectively at an early stage have little chance of escalating into serious problems involving senior management, costing time and money.
- ☐ A complaint / grievance which cannot be aired could lead to distrust and poor labour relations. Do not act abruptly or appear to be disinterested when dealing with a complaint / grievance.
- ☐ It could mean having to deal with the problem at a later stage, perhaps on a higher level as the employee will not be satisfied with the action you take or your approach to the matter.
- ☐ Employees lodging complaints / grievances may be represented by a Shop Steward of his/her choice or any other employee.
- ☐ Representation in complaints should however not be encouraged as this would tend to formalise the matter and defeat the object of the informal and flexible procedure.
- ☐ Keep suitable records of all statements and actions taken.

10 August 2021

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DATE:

TO: FROM:

..... COMPANY:

.....

RE: Grievance

Details of the Grievance:

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.....
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.....
.....
.....

.....

Signature of employee

.....

Date



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Acknowledgment of receipt:

Stage 1

.....
Manager

.....
Date

Stage 2

.....
Manager

.....
Date

Stage 3

.....
Manager

.....
Date



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Human Rights Policy

The Mandala Consulting Group (Pty) Ltd conduct's our business in a manner that respects the rights and dignity of all people. This commitment is based on the belief that business should be conducted honestly, fairly and legally.

Human Rights Commitment:

- Our employees, contractors and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- We expect all employees, contractors and suppliers to share our commitment to high moral, ethical and legal standards.
- We consider the safety and wellbeing of all employees, contractors and stakeholders as our top priority. We are committed to protecting and safeguarding the safety of those who work at or visit our operations.
- Our employees are treated fairly and without discrimination of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability or the receipt of public assistance
- We respect the rights of people in communities impacted upon by our activities. We will seek to engage with people in such communities to identify potential adverse human rights impacts and take appropriate steps to avoid, minimise and/or mitigate them.

We seek to ensure that stakeholders who are or could be affected by our activities have access to feedback mechanisms that are legitimate, accessible, timely, equitable and transparent. The approach to resolving disputes and grievances is based on respect, engagement and dialogue with the stakeholders and communities that are affected by us or affect what we do.



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10 August 2021



MANDALA CONSULTING
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Occupational Health and Safety Policy



1. PURPOSE

- 1.1 To ensure a healthy and safe environment for all Employees of MANDALA CONSULTING GROUP (PTY) LTD.
- 1.2 To educate both Management and Employees about their health and safety duties.
- 1.3 To comply with the requirements of the Occupational Health and Safety Act (OHSA).
- 1.4 To create a platform for the establishment of Health and Safety structures, such as a Health and Safety Committee and Representatives.

2. GUIDING PRINCIPLES

- 2.1 There is collective commitment in providing and maintaining a safe and healthy working environment for Employees.
- 2.2 As far as is practicably possible, MANDALA CONSULTING GROUP (PTY) LTD will attempt to prevent any accident or injury at the workplace.
- 2.3 Regular consultation on Health and Safety matters will occur with Employees. Management will be open to input from Employees, and respond to the concerns of Employees in a reliable and responsible manner.
- 2.4 Effective Occupational Health and Safety management requires adherence to the Policy at all levels of the workplace.
- 2.5 It is the duty of each individual Employee to do everything possible to prevent injury and accidents at the workplace.
- 2.6 All parties, Management and Employees alike, assume ownership and responsibility for the maintaining of acceptable Occupational Health and Safety practices at the workplace.



3. DEFINITIONS

“Consultation”

Interaction between parties during which respective positions and opinions are exchanged, with a view to reaching consensus.

“Health and Safety Regulations”

Regulations, which exist in MANDALA CONSULTING GROUP (PTY) LTD and in statute, which govern Occupational Health and Safety.

“Health and Safety Representatives”

Representatives appointed to the Health and Safety Committee, to represent Employees in Health and Safety matters, increase awareness of safety matters, and draw attention to Health and Safety issues in the workplace.

“OHS Act”

The Occupational Health and Safety Act, 85 of 1993

4. DUTIES OF THE EMPLOYER

- 4.1 Implementation and monitoring of the Health and Safety Policy on a day-to-day basis.
- 4.2 Implementation of departmental safety procedures, standards, accident reporting, training, information and facilities.
- 4.3 Development of an Emergency Evacuation Plan in the event of fire, floods or any other natural disasters or acts of God.
- 4.4 To the extent that it is reasonably practicable, ensure that all necessary Health and Safety facilities and equipment are supplied and maintained in a serviceable and hygienic condition, to each Employee. This should include appropriate equipment and materials to protect Employees from the risk of exposure to HIV.



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- 4.5 Development of Contingency Plans in the event of fire, floods or any other natural disasters or acts of God.
- 4.6 Regular liaison with Health and Safety Representatives and the Health and Safety Committee.
- 4.7 Regular communication of the Health and Safety Policy, Emergency Procedure, Contingency Plans and other relevant information to Employees.
- 4.8 Monthly monitoring of work practices, implemented safety measures and adherence to the Policy.

5. DUTIES OF EMPLOYEES

- 5.1 To take personal responsibility for his/her actions regarding Health and Safety as they affect themselves and other persons.
- 5.2 To co-operate with Management in the implementation of the Occupational Health and Safety Policy.
- 5.3 To carry out lawful instructions from those in authority regarding the Health and Safety Policy and Procedures.
- 5.4 Report any unhealthy or unsafe situation or accident, which affects the Health and Safety of any person in the workplace.
- 5.5 To not act recklessly in the execution of his/her duties, or to interfere with the work or objectives of the Health and Safety Committee or any of its Representatives or the objectives of the Policy.

6. APPOINTMENT OF HEALTH AND SAFETY COMMITTEE (if more than 50 employees)

6.1 Objectives of the Committee

- 6.1.1 Must seek to promote the interests of all Employees in the workplace, irrespective of their status;



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- 6.1.2 Must seek to enhance efficiency in the workplace through actively seeking out input from all Employees;
- 6.1.3 Must actively promote the vision, mission and values of MANDALA CONSULTING GROUP (PTY) LTD;
- 6.1.4 Is entitled to participate in joint decision-making about the matters relating to the Health and Safety Committee;
- 6.1.5 Must support and promote MANDALA CONSULTING GROUP (PTY) LTD's Occupational Health and Safety Policy and Procedures;
- 6.1.6 Must make recommendations to Management relating to the Health and Safety of Employees;
- 6.1.7 Must discuss various incidents in the workplace relating to illness, injury or death;
- 6.1.8 Ensure the correct reporting of incidents to the Compensation Commissioner;
- 6.1.9 Keep record of all Health and Safety documentation, including those relating to internal and external inspections;
- 6.1.10 Must discuss and report on regular inspections conducted by the Health and Safety Representatives;
- 6.1.11 Perform any other functions required of them by regulation.

6.2 Duties of Health and Safety Representatives

- 6.2.1 To bring to the attention of the CEO and/or the Health and Safety Committee any potential hazards, dangerous work practices and conditions, which exist within Mandala Consulting Group (Pty) Ltd
- 6.2.2 Examination of departmental equipment and machinery with relevant Manager on a monthly basis.



6.2.3 Investigate the cause of accidents with the relevant Manager.

6.2.4 To attend meetings of the Health and Safety Committee.

6.2.5 To represent Employees in his/her division in matters concerning Health and Safety.

6.2.6 To promote greater awareness of safe and healthy practices in the workplace.

7. OCCUPATIONAL HEALTH AND SAFETY TRAINING PROGRAMME

7.1 All Employees will be required to attend a compulsory Health and Safety Induction Training Programme before commencing work.

7.2 The Health and Safety Training Programme will be compiled by a process of consultation between the CEO, the Human Resources Representatives and the Health and Safety Committee.

7.3 The programme will incorporate all relevant aspects of the Occupational Health and Safety Policy, as well as procedures for the reporting of occupational accidents and reporting of ill health.

7.4 Training to all Employees will be given on MANDALA CONSULTING GROUP (PTY) LTD's Emergency Procedure and Contingency Plans.

8. ACCESS CONTROL

8.1 Access to specified areas and/or offices will be restricted, unless explicit authorization is obtained from the CEO.

8.2 Office keys and/or a remote for the alarm system will be issued in writing to designated Employee/s who are assigned with the responsibility of securing the offices, or who work after hours and on weekends. It is the responsibility of the designated Employee/s who has been assigned with office keys and/or a remote for the alarm system to keep the assigned office keys and/or remote for the alarm safe at all times.



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9. COMMUNICABLE DISEASES

- 9.1 Employees who are suffering from communicable diseases or any illness for which they are put in quarantine, must inform their direct Manager and the Human Resources Representative immediately so that the spreading of the disease can be prevented.
- 9.2 A medical certificate from a registered medical practitioner stating the nature and duration of the communicable disease must reach the employer within 24 (twenty-four) hours from diagnosis.

10. EMERGENCY EVACUATION

- 10.1 The purpose of the Emergency Evacuation Plan is to highlight the evacuation procedures that are applicable when a state of emergency is required at MANDALA CONSULTING GROUP (PTY) LTD's offices.
- 10.2 It is expected of all Employees during emergency evacuation to exercise a duty of care towards fellow Employees. Apart from the needs of the physically handicapped, other Employees may develop symptoms of distress or tension, and a helping hand and reassurance towards such colleagues or the summoning of additional assistance, is the appropriate humanitarian gesture.
- 10.3 No Employee should evacuate the building unless instructed to do so.
- 10.4 Employees will obey the instructions of the Health and Safety Representatives without argument.
- 10.5 Only the stairwells and routes indicated for an emergency evacuation will be used during an emergency evacuation.
- 10.6 Employees will be required to walk in a single line, to not run and to keep to the rail side of the stairwell. Telephones, Mobile Phones, I-Pads and any other electronic devices will not be used during emergency evacuation.
- 10.7 Visitors, contractors and any other person in a specific area will evacuate with the Employees under the direction of the Health and Safety Representative from that area.



- 10.8 Special arrangements made by Managers in terms of business continuity plans should be completed before emergency evacuation. Other business activities will be terminated immediately if an evacuation is ordered.
- 10.9 Unnecessary talking should be avoided during evacuation and Managers evacuating with the Employees will encourage observation on the rule.
- 10.10 Physically handicapped, elderly and frail people as well as pregnant employees will be assisted by colleagues using the same evacuation route and Health and Safety Representatives will encourage adherence to this rule.
- 10.11 Employees will be required to proceed directly to the assembly area where Health and Safety Representatives will initiate roll call.
- 10.12 The Health and Safety Representatives, assisted by a manager, will ensure that roll call is done properly. The Health and Safety Representatives will report any absenteeism to the emergency controller for further investigation.
- 10.13 Employees who are not at their workstations when emergency evacuation is ordered will evacuate under direction of the Health and Safety Representative from where they find themselves when the instruction to evacuate is given.
- 10.14 Equipment supplied and installed for the safety of Employees during emergency evacuation and fire-fighting must not be tampered with. Employees who do so are putting the life and safety of their colleagues at risk. The action of such Employees must be reported immediately and disciplinary action will be initiated against any such individuals if deemed appropriate.
- 10.15 Employees are required to familiarize themselves with all Emergency Evacuation Plans and Instructions; know who their Health and Safety Representatives are, know the emergency evacuation routes in the building, know where to assemble and be constantly aware of fire risks, safety hazards and foreign objects and report such to the Health and Safety Representative.
- 10.16 Emergency evacuation exercises will take place at least twice a year. Exercises may be announced in advance or may be ordered without prior notice.

11. HEALTH EXAMINATIONS AND CHECKS

- 11.1 In the event of an Employee's incapacity due to prolonged ill-health or injury, and for any reasonable purpose and upon reasonable notice to the Employee or potential Employee, and after proper consultation, MANDALA CONSULTING GROUP (PTY) LTD may require the Employee to submit to a medical examination by one or more registered medical practitioners nominated by the Company.
- 11.2 The costs of the examination will be borne by MANDALA CONSULTING GROUP (PTY) LTD and it shall be entitled to receive a report from such practitioner/s concerning whether the Employee is likely to be fit for work in the short, medium and/or long term.
- 11.3 The Employee may be required to submit to a medical examination should the nature of the position and work to be carried out, necessitate this.
- 11.4 Employees may, at the discretion of MANDALA CONSULTING GROUP (PTY) LTD, be required to undergo random health, alcohol and/or drug checks with the objective of maintaining minimum levels of standards to perform job-related duties and reduce the risks associated with substance abuse in the workplace.
- 11.5 Results of these tests will be managed in line with the provisions of Section 14 of this Policy and will not be used as a basis for discrimination.

12. ILLNESS OR INJURY AT WORK

- 12.1 Illness and/or injury sustained at work must be reported to the Employee's direct Manager and a Health and Safety Representative as soon as this occurs, but at least within 24 (twenty-four) hours of the illness or injury being disclosed.
- 12.2 The Health and Safety Representative must report any occupational illness, suspected to have arisen out of an inappropriate workplace practice, and/or any substantive injury sustained, at the workplace, to the Managing Director, who must ensure that the appropriate remedial action is initiated and taken.
- 12.3 A First Aid Box with a First Aid Register will be available at the HR office and will be managed by the Human Resource representative.



- 12.4 All incidents and accidents will be reported by the Human Resources Representative to the Compensation Commissioner within 24 (twenty-four) hours of disclosure and records kept in line with the provisions of Section 14 of this Policy.

13. MEDICAL RECORDS

- 13.1 Disclosure of medical information requires written consent by the Employee.
- 13.2 Medical records will be managed in line with medical ethos and relevant legislation.

14. NIGHT WORK AND EMERGENCY WORK

- 14.1 Night work and emergency work will be performed in terms of the relevant Terms and Conditions of Employment, if relevant.
- 14.2 Assistance with transport for night work and emergency work will be provided in line with legislative requirements, as may be implemented from time to time.
- 14.3 Employees will regularly be informed of any hazards associated with night work and emergency work.

15. PERSONAL PROTECTIVE EQUIPMENT (PPE)

- 15.1 MANDALA CONSULTING GROUP (PTY) LTD will ensure that all relevant Employees are issued with the necessary Personal Protective Equipment (PPE) and will ensure that a PPE Register is maintained and updated on a daily basis.
- 15.2 All Employees are required to wear the PPE appropriate to the work they are undertaking and/or the workplace they are entering at all times.
- 15.3 Broken and/or damaged PPE must be reported to the Health and Safety Representative so that the PPE can be replaced. In case of negligence or lost, the necessary disciplinary action may be taken.



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15.4 Immediate intervention and disciplinary action will be taken against those Employees who fail and/or refuse to wear MANDALA CONSULTING GROUP (PTY) LTD's prescribed PPE.

15.5 Resigning and/or terminated Employees will be required to hand-in all the PPE that has been issued to them during the course of their employment at MANDALA CONSULTING GROUP (PTY) LTD before their last day of work.

16. PROTECTION OF FEMALE EMPLOYEES

16.1 A pregnant employee or nursing mother must be protected from conditions at the workplace, which are hazardous to her or her child's health.

16.2 Where necessary and reasonably practicable, the Employee should be accommodated in suitable alternative employment, on terms and conditions no less favourable than her ordinary terms and conditions.

17. SMOKING AT THE WORKPLACE

17.1 The purpose of this section of the Policy is to protect non-smokers from passive smoking and/or smoke inhalation, to regulate and manage smoking in the workplace and to identify demarcated areas for smoking.

17.2 MANDALA CONSULTING GROUP (PTY) LTD regards passive smoking or smoke inhalation by non-smokers to be a matter of concern with special reference to the measurable health effects of smoking, environmental issues, legal risks associated with smoking at the workplace as well as consideration for Occupational Health and Safety implications.

17.3 To lessen the risk associated with smoking and passive smoking and ensure adherence to relevant South African legislation, MANDALA CONSULTING GROUP (PTY) LTD has designated the following areas for smoking to Employees, vendors, clients and stakeholders.

- **In the parking area and the garden**

17.4 Smoking is strictly prohibited in the following areas:



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- Meetings, conferences and other gatherings
- Inside passages
- Public places such as reception area.
- Toilets, Restrooms, Kitchen
- Shared open-plan offices
- Inside MANDALA CONSULTING GROUP (PTY) LTD vehicles
- Visible areas such as entrances and exits to the building

17.5 As a term and condition of employment, smoking Employees will be allowed to smoke during tea and lunch breaks, or as specified and agreed upon by Management of that specific division or department.

18. HEALTH AND SAFETY TALKS

18.1 MANDALA CONSULTING GROUP (PTY) LTD is committed to have regular health and safety talks with office Employees on topics such as the following:

- HIV/AIDS
- Alcohol and Drug Abuse
- Risk Assessments
- Manual handling and lifting
- Accident Prevention
- Fire Prevention
- House Keeping
- Protecting the Environment
- Emergency Evacuation
- Personal Hygiene

18.2 It is the policy of MANDALA CONSULTING GROUP (PTY) LTD that all those Employees who visits and/or perform duties on client and/or third-party sites will subject themselves to that particular client and/or party's Occupational Health and Safety Induction Programme, including attending all necessary toolbox talks.



- 18.3 An attendance register should be kept for each health and safety talk that takes place at MANDALA CONSULTING GROUP (PTY) LTD and handed to the Human Resources Representative for record keeping purposes.

19. VEHICLE USAGE

- 19.1 It is the policy of MANDALA CONSULTING GROUP (PTY) LTD that all those Employees who are assigned with and drives a company vehicle shall adhere to any vehicle usage safety guidelines as instructed and as described by the Vehicle Usage Policy, with special reference to the instruction to wear a seatbelt at all times whilst driving a company vehicle.
- 19.2 Employees who are assigned with and drive a company vehicle are required to report any road accidents that they may be involved in immediately to their Team Leader or CEO.
- 19.3 As a term and condition of employment, all employees who use a personal and/or company assigned vehicle for transport to and from work and/or for business purposes, are required to hold and maintain a valid South African driver's licence; and to update their licensing status with the Human Resources Representative within 24 (twenty-four) hours of changes in licensing status.

20. VIOLENCE IN THE WORKPLACE

- 20.1 Violence at the workplace, including abusive language against another person shall not be tolerated.
- 20.2 MANDALA CONSULTING GROUP (PTY) LTD shall, as far as is reasonably possible, ensure that the workplace is violence free and incitement to commit a violent act is *inter alia* an example of a form of violence.
- 20.3 Assault, attempted assault, antagonism, incitement and/or abusive language are all regarded as forms of violence.

21. CONTRAVENTION OF HEALTH AND SAFETY REGULATIONS

- 21.1 Disciplinary action will be taken in terms of MANDALA CONSULTING GROUP (PTY) LTD's Disciplinary Code and Procedure where necessary, and in the event that any Employee contravenes



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prescribed safety procedures or acts in any manner that could/may cause damage, injury and/or death.

- 21.2 Where Health and Safety standards are affected by an infringement committed by any Employee, the Health and Safety Representative should be informed immediately.
- 21.3 The Health and Safety Representative must report any infringement of the Policy to the Health Safety Committee, who in turn must recommend the appropriate action required to the CEO and the Human Resources Representative.

10 August 2021

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MANDALA CONSULTING
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Sexual Harassment Policy



1. INTRODUCTION

- 1.1 The Company is committed to and underwrites the provisions of the Constitutional Bill of Rights. Sexual harassment is a violation of the fundamental rights of people (women in particular) and is a violation of the right to equality, human dignity, security of person and fair labour practices.
- 1.2 In accordance with the requirements of statute, the Company adheres to the provisions of this policy and procedure which are aimed at eliminating sexual harassment in the workplace.
- 1.3 The Company will not tolerate disrespect for one another's integrity and dignity, privacy and the right to equity at the workplace. It views sexual harassment, in any form, as extremely serious and summary dismissal may result.

2. APPLICATION

- 2.1 This policy and procedure is primarily aimed at guiding the Company and its employees in regard to this subject but is also broad enough to recognize that the perpetrators and victims of sexual harassment may include: managers, supervisors, job applicants, clients, suppliers, contractors, others who conduct business with or have dealings with the Company.
- 2.2 Notwithstanding 2.1 above, the Company and its employees do not have the right to take disciplinary action against non-employees but could elect to pursue any other remedies at law. Non-employees who allege that they have been the victim of sexual harassment may, in



addition to any other recourse recognised in law, lodge a complaint in writing to the employer of the harasser where the harassment has taken place at the workplace or in the course of the harasser's employment or in circumstances in which the organisation has an interest.

3. DEFINITION OF SEXUAL HARASSMENT

- 3.1 Sexual harassment is unwanted conduct and/or behaviour of a sexual nature. The unwanted nature of sexual harassment distinguishes it from conduct and/or behaviour which is welcome and mutual.
- 3.2 Sexual attention becomes sexual harassment if:
 - 3.2.1 The conduct and/or behaviour is persisted in, although a single incident of harassment can constitute sexual harassment and/or
 - 3.2.2 The recipient has made it clear that the conduct and/or behaviour is considered offensive; and/or
 - 3.2.3 The perpetrator should have known that the conduct and/or behaviour are regarded as unacceptable.
- 3.3 Such behaviour has the purpose and effect of adversely affecting the individual's employment opportunities, employment capabilities or creating an intimidating, hostile or degrading employment environment for that person.



4. FORMS OF SEXUAL HARASSMENT

4.1 Sexual harassment includes unwelcome/unwanted physical, verbal or non-verbal conduct and/or behaviour, but is not limited to the examples listed as follows:

4.1.1 Physical conduct of a sexual nature which includes all unwanted physical contact, ranging from touching to sexual assault and rape and includes a strip search by or in the presence of the opposite sex.

4.1.2 Verbal forms of sexual harassment include unwarranted innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed towards them, unwelcome and inappropriate enquiries about a person's sex life, and unwelcome whistling directed at a person or group of persons.

4.1.3 Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects.

4.1.4 Quid pro quo harassment occurs where an owner, employer, supervisor, member of management or co-employee undertakes or attempts to influence the process of employment, promotion, training, discipline, dismissal, salary increment or other benefit of an employee or job applicant, in exchange for sexual favours.

Sexual favouritism exists where a person who is in a position of authority rewards only those who respond to his/her sexual advances, whilst other deserving employees who do not submit themselves to any sexual advances are denied promotions, merit rating or salary increases.



5. PRINCIPLES

5.1 The Company will as far as is reasonably practicable create and maintain a working environment in which the dignity of employees is respected and in which victims of sexual harassment will not feel that their grievances are ignored or trivialized, or fear reprisals. These endeavours will include establishing the following guidelines:

- Management and employees are to refrain from committing acts of sexual harassment;
- Management and employees share the responsibility of creating and maintaining a working environment in which sexual harassment is unacceptable by ensuring that their standards of conduct and/or behaviour do not cause offence and by discouraging unacceptable behaviour on the part of others;
- Management should apply the same principles to ensuring that customers, suppliers, job applicants and others who have dealings with the Company are not subjected to sexual harassment by employees;
- Management is expected to take appropriate action in accordance with this policy when instances of sexual harassment which occur within the workplace or which the Company has an interest in are brought to their attention.

5.2 The disciplinary and grievance procedure and code applies in addition to this policy and is to be used as a guideline by the parties.

6. PROCEDURES

6.1 **Advice and assistance:**

In the event that a victim of sexual harassment should feel unable to approach the perpetrator, lodge a formal grievance or turn to colleagues for support,



such a person may approach the Company's Labour Relations Consultant/s who will give advice in their capacity as outside professionals and such advice shall include, but not be limited to, the matters listed hereunder.

6.1 Options to resolve a problem:

6.1.1 Informal Procedure: If the aggrieved employee prefers in- formal action, the HR Practitioner will call the accused to a private meeting, advise them of the details of the complaint lodged, assure the accused that his/her own identity will remain confidential, give the accused the opportunity to state his/her case, explain the outcome that the aggrieved employee requests (an informal settlement) and advise the accused of the possible consequences if proved guilty of sexual harassment in a formal disciplinary enquiry.

The HR Practitioner will again meet with the aggrieved employee, advise the said person of the alleged perpetrator's response and, if the aggrieved employee is satisfied, invite both parties to meet to consider resolving and settling the matter without the need for formal disciplinary action. The HR Practitioner will assess what support and assistance the complainant may require after settlement.

6.1.2 Formal Procedure: If the matter is not settled, or if the aggrieved employee wants formal disciplinary action, the HR Practitioner shall investigate the allegations sensitively, interview witnesses, and get written statements. If there is sufficient evidence, on a balance of probabilities, to succeed in proving behaviour/conduct which constitutes sexual harassment, the normal disciplinary procedures in respect of a formal disciplinary hearing shall be followed.

6.3 Criminal and civil charges may be pressed against the alleged perpetrator and the legal rights of the victim are in no way limited by this code.

7. CONFIDENTIALITY



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- 7.1 Managers and employees must ensure, as far as is reasonably practicable, that grievances about sexual harassment are investigated and handled in a manner which ensures that the identities of the persons involved are kept confidential.
- 7.2 In cases of sexual harassment, management, employees and the parties concerned must endeavour to ensure confidentiality in the disciplinary enquiry. Only appropriate members of management as well as the aggrieved person, representative, alleged perpetrator, his/her representative, witnesses and interpreter (if required) must be present in the disciplinary enquiry.
- 7.3 Disclose of confidential information will be regulated in accordance with the provisions of the Labour Relations Act.

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