



# LIMPOPO

PROVINCIAL GOVERNMENT  
REPUBLIC OF SOUTH AFRICA

Department of  
**Public Works, Roads and  
Infrastructure**

<b>Policy Name</b>	<b>Ethics Management Policy</b>
<b>The revision/ version of the Policy</b>	<b>01</b>
<b>Domain</b>	<b>Risk and Corporate Governance</b>

MD

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## 1. ACRONYMS AND ABBREVIATIONS

<b>AO</b>	Accounting Officer
<b>AC</b>	Audit Committee
<b>EA</b>	Executive Authority
<b>EC</b>	Ethics Committee
<b>EO</b>	Ethics Office
<b>CRO</b>	Chief Risk Officer
<b>Contractor</b>	A person/ Company contracted by the Department to provide services.
<b>DPSA</b>	Department of Public Service and Administration
<b>EXCO</b>	Executive Committee
<b>Department</b>	Department of Public Works Roads and Infrastructure
<b>HR</b>	Human Resources
<b>HOD</b>	Head of Department
<b>SAPS</b>	South African Police Service
<b>SCM</b>	Supply Chain Management
<b>SMS</b>	Senior Management Service
<b>RMC</b>	Risk Management Committee
<b>PFMA</b>	Public Finance Management Act 1 Of 1999
<b>PRECCA</b>	Prevention and Combating of Corrupt Activities Act
<b>PSA</b>	Public Service Act
<b>PSR</b>	Public Service Regulations 2016
<b>SCM</b>	Supply Chain Management

## 2. INTRODUCTION

Section 30 of the Public Service Act provides that the public service employees must obtain permission from the Executive Authority before they engage in other remunerative work. This requirement assists the department to –

- a). manage the risk of potential, perceived or actual conflict of interest which might arise from employees performing other remunerative work; and
- b). Detect and prevent other remunerative work from impacting negatively on the conduct of employees as well as from interfering or impeding the effective and efficient performance of the employee.

Chapter 2, Regulation 13 (c) of the Public Service Regulations provides that an employee shall not conduct business with any organ of state or be a director of a public or private company conducting business with an organ of state, unless such employees is in an official capacity a director of a company listed in schedule 2 and 3 of the Public Finance Management Act. Regulation 11(b) of the Public Service Regulations provides that an employee shall put the public interest first in the execution of his/her daily duties.

In line with the above requirements, the employees of the Department are prohibited from conducting business with any organ of state and are expected to obtain approval from the Executive Authority prior engaging in other remunerative work outside the Department.

This policy focused on four aspects: (a) ethical Conduct of employees (b) conducting business with an organ of state, (c) performing other remunerative work outside of public service and (d) establishment of ethics committee including roles and responsibilities with committee and ethics officer.

### **3. Purpose and Objectives of the Policy**

#### **3.1 Purpose**

This policy outlines the requirements and procedure to be followed when employees applied to undertake other remunerative work outside public service, as contemplated in the determination on other remunerative work outside the public service of the Public Service Integrity Management Framework.

- a). Promote ethical behaviour among employees in the Department;
- b). Exemplary conduct and practices by the Department's employees/suppliers in the quest to achieve service excellence
- c). Desist from corruption or any unethical conduct.
- d). Reduce possible, perceived and potential conflict of interest;
- e). prohibit all employees from conducting business with an organ of state; and
- f). Prohibit all employees from being a director of a company or a member of a close corporation conducting business with an organ of state.

#### **3.2 Objectives**

The objectives of this policy in the Department will be:

- a). To ensure that the mission, vision and values of the Department are upheld at all times.
- b). To ensure that the principles of Batho Pele reflects in our day to day running of the Department.
- c). To ensure that there is a high level of professionalism by both management and employees.
- d). To proactively promote responsible conduct
- e). To provide preventative capacity to complement the internal fraud prevention strategy.
- f). Employees adhere to principles, prescripts and directives of the Public Service Code of Conduct, policies and procedures and any applicable laws or regulations.

#### **4. Authority of the policy**

This policy is issued and authorised by the Executive Authority of the Department of Public Works, Roads and Infrastructure.

#### **5. Legal and policy framework**

- 5.1 Constitution of RSA Act no.108 of 1996
- 5.2 Public Service Act no 103 of 1994
- 5.3 Public Service Regulations 2016
- 5.4 Treasury Regulations 2001
- 5.5 Public Finance Management Act 1 of 1999
- 5.6 The Public Service Anti-Corruption Strategy
- 5.7 Prevention and Combating of Corrupt Activities Act 12 of 2004
- 5.8 Senior Management Service Public Service Handbook 2003 as amended;
- 5.9 Directive on conducting business with an organ of state, January 2017;
- 5.10 Department of Public Service and Administration (DPSA) Circular EMI No. 2/2016.
- 5.11 Cabinet decision: Handbook for the appointment of persons to board of State and State controlled institutions.
- 5.12 Directive on other remunerative work outside the employee's employment in the relevant department, 1 November 2016.
- 5.13 Guideline on the reporting of unethical conduct, corruption and non-compliance to the Public Service Act, 1994 and Public Service Regulations, 2016 in the Public Service.
- 5.14 Guide on managing other remunerative work performed outside the Public Service.

## 6. Policy Statement

While carrying out the mission, vision and mandate of the Department employees and management should:

- a) Promote a high standard of professional ethics.
- b) Avoid any interest or activity that is in conflict with the conduct of their official duties.
- c) Respect and protect privileged information to which they have access to in the course of their official duties.
- d) Exercise their authorized powers within the parameters of the departmental policies, rules and regulations.
- e) Safeguard public funds and other public properties entrusted to them and ensure that no damage, loss or misappropriation occurs to them due to negligence or for the benefit of any individual or group.
- f) Use official time in an honest way to fulfil official responsibilities (not for private activities or leisure).
- g) Not offer improper favours, solicit, force or accept bribes from any person whom they served, are serving or likely to serve either by doing so personally or through another person.

## 7. Scope of application

This policy applies to all employees of the Department of Public Works, Roads and Infrastructure and any employees who contravenes a provision of this policy will be guilty of misconduct, and be dealt with in accordance with the Disciplinary Code and Procedures contained in GPSSBC Collective Agreement 2 of 1999 and Handbook for the Senior Management Service.

## 8. Definitions

**“Accounting Officer”** means the Head of Department of Limpopo Public Works, Roads and Infrastructure Department;

**“Applicant”** refers to an employee who request permission from the relevant executive authority to perform other remunerative work;

**“Business”** includes any business, trade, occupation, profession, calling, industry or undertaking of any kind or any activity carried on for gain or profit by any person within the Republic or elsewhere, and includes all property derived from or used in or for the purpose

of carrying on such other activity, and all the rights and liabilities arising from such other activity;

**“Code of Conduct”** means the Public Service Code of Conduct contained in Part 1 of Chapter 2 of the Public Service Regulations.

**“Commission”** means the Public Service Commission established in terms of section 196(1) of the Constitution (Chapter 10 of the Constitution of the Republic of South Africa)

**“Conflict of Interest”** refers to a conflict between the public duties and private interests of an employee, in which the employee has private interests which could improperly influence him/her, and/or negatively impact on his/her disposable time to work, and and/or negatively impact on his/her official obligations or official duties, and/or negatively impact on the public interest.

**“Delegated authority”** means the functionary to whom the power is duly delegated or authorised in terms of Section 42A of the Public Service Act.

**“Department”** means the Limpopo Department of Public Works, Roads and Infrastructure

**“Employee”** means any a person contemplated in Section 8 of the Public Service Act of 1994, but excludes a person appointed in terms of Section 12A of the Public Service Act of 1994.

**“Ethics Officer”** means an employee of the Department duly appointed to be responsible for day- to –day –work related to the ethics management programme in the Department.

**“Executive Authority”** means an executive authority as defined in Section of the Public Service Act, 1994. For the of this policy the Executive Authority means the Member of the Executive Council for Department of Public Works, Roads and Infrastructure.

**“Public Service Act or the Act”** means the Public Service Act, 1994.

**“Public Service”** means the public service as defined in the Public Service Act.

**“Public Service Regulations”** means the Public Service Regulations 2016.

**“Other remunerative work”** means any business carried out or services rendered for gain or personal benefit by an employee outside his or her employment in the relevant department, for which remuneration is received; and

**“Remuneration”** means any payment or benefit in cash or in kind.



## **9. Policy pronouncement**

### **9.1 Ethical Conduct**

**An employee of the Department of Public Works, Roads and Infrastructure must comply with Regulation 13 of the Public Service Regulations, 2016 and shall —**

- (a) Not receive, solicit or accept any gratification, as defined in section 1 of the Prevention and Combating of Corrupt Activities Act, 2004 (Act No. 12 of 2004), from any employee or any person in return for performing or not performing his or her official duties;
- (b) Not engage in any transaction or action that is in conflict with or infringes on the execution of his or her official duties;
- (c) Not conduct business with any organ of state or be a director of a public or private company conducting business with an organ of state, unless such employee is in an official capacity a director of a company listed in schedule 2 and 3 of the Public Finance Management Act;
- (d) Recuse herself or himself from any official action or decision-making process which may result in improper personal gain, and this shall immediately be properly declared by the employee;
- (e) Immediately report to the relevant authorities, fraud, corruption, nepotism, maladministration and any other act which constitutes a contravention of any law (including, but not limited to, a criminal offence) or which is prejudicial to the interest of the public, which comes to his or her attention during the course of his or her employment in the public service;
- (f) Refrain from favouring relatives and friends in work-related activities and not abuse his or her authority or influence another employee, nor be influenced to abuse his or her authority;
- (g) Not use or disclose any official information for personal gain or the gain of others;
- (h) not receive or accept any gift from any person in the course and scope of his or her employment, other than from a family member, to the cumulative value of R350 per year, unless prior approval is obtained from the relevant executive authority;

(i) If he or she has permission in terms of section 30 of the Public Service Act to perform outside remunerative work, not—

(i) Perform such work during official work hours; and

(ii) Use official equipment or state resources for such work.

(j) Deal fairly, professionally and equitably with all other employees or members of the public, irrespective of race, gender, ethnic or social origin, colour, sexual orientation, age, disability, religion, political persuasion, conscience, belief, culture or language; and

(k) Refrain from party political activities in the workplace.

## **9.2 Unethical conduct constituting Fraud and Corruption**

9.2.1. The following manifestations are by no means exhaustive as unethical or unprofessional conduct appears in many forms and it is virtually impossible to list all of them.

a) Unauthorised private use of the Department's assets, including vehicles, telephones, etc.

b) Falsifying travel and subsistence claims

c) Conspiring unfairly with others to obtain a tender;

d) Disclosing proprietary information relating to a tender to outside parties;

e) Accepting inappropriate gifts from suppliers;

f) Employing family members or close friends;

g) Operating a private business during working hours;

h) Stealing equipment or supplies from work;

i) Accepting bribes or favours to process requests;

j) Accepting bribes or favours for turning a blind eye to a service provider who does not provide an appropriate service;

k) Submitting or processing false invoices from contractors or other service providers; and

l) Misappropriating fees received from clients, and avoiding detection by not issuing receipts to those clients.

- m) Misuse of Department's petrol and credit card for personal gain.
- n) Using state vehicle for personal business operation.
- o) Using official airplane ticket for personal trips.
- p) Collusion or inflation of quotations for financial gain or reward.
- q) Theft or Misuse of official rental vehicles by office.
- r) Use of department funds for personal/ leisure travel.
- s) Conducting business with organ of state (in terms of new 2016 Public Service Regulations).
- t) Being an accessory to or after the offence of Fraud and Corruption.

### **9.3 Financial Disclosure**

9.3.1. A head of department shall, not later than 30 April of each year, disclose to the relevant executive authority, in the prescribed form, particulars of all his or her interests in respect of the period 1 April of the previous year to 31 March of the year in question.

9.3.2. SMS members will, not later than 30 April of each year, disclose to the relevant head of department, in a prescribed form, particulars of all his or her interests in respect of the period 1 April of the previous year to 31 March of the year in question.

9.3.3. Any other designated employee not contemplated in subsection (1) and (2) will submit to the relevant head of department a prescribed form, particulars of all his or her interests for the period from 1 April to 31 March of the following year.

9.3.4. Any person who assumes duty as an employee on or after 1 April in a year shall make such disclosure within 30 days after assumption of duty in respect of the period from 01 April to date of disclosure.

9.3.5. An employee must comply with Regulation 13 of 2016 Public Service Regulations if permission has been granted in terms of section 30 of the Public Service Act to perform outside remunerative work, not—

- (i) Perform such work during official work hours; and
- (ii) Use official equipment or state resources for such work.

9.3.6. The following kinds of financial interests are disclosable interests:

- a). Shares, Loan accounts or any other form of equity in a registered private or public companies and other corporate entities recognised by law.
- b). Income –generating assets
- c). Trusts (Remuneration received from, Name and Purpose of the account)
- d). Directorship and Partnerships.
- e). Remunerative work outside the employee's employment of his or her department.
- f). Consultancies and Retainerships
- g). Sponsorships
- h). Gifts and hospitality from a source, other than a family member.
- i). Ownership and other interests in immovable property
- j). Vehicles

#### **9.4. Failure to disclose financial interests**

9.4.1. In terms of Public Service regulation, any designated employee who-

- (a) Fails to disclose an interest
- (b) When disclosing an interest in terms of regulation C of this Chapter, wilfully provides incorrect or misleading details, is guilty of misconduct.

#### **10. Conducting business with organ of state**

Regulation 13 (c) of the 2016 Public Service Regulation provides that employee shall not conduct business with any organ of state or be a director of a public or private company conducting business with an organ of state, unless such employee is in an official capacity a director of a company listed in schedule 2 and 3 of the Public Finance Management Act. Circular EIM 1/2016 is issued in respect of the above-mentioned regulation.

10.1 What Constitutes conducting business with an organ of state?

10.1.1 The Directive on conducting business with an organ of state, January 2017, states that conducting business with an organ of state includes any business, trade,

occupation, profession, calling, industry or undertaking of any kind, or any activity carried on for gain of profit by any person within the Republic of South Africa or elsewhere, and includes all property derived from or used in or for the purposes of carrying on such other activity, and all the rights and liabilities arising from such activity.

10.1.2 An employee is regarded as "conducting business with an organ of state" when an employee or an employee acting as a Director of private or public company-

- a). Concludes, or intends to conclude, a written or oral agreement, irrespective of the process followed with an organ of state;
- b). Such agreement is not associated with that employee's employment with his or her department;
- c). Through such agreement provides goods or services to any organ of state for any benefit, financial or otherwise.

10.1.3 Activities by employees not constitution conducting business with an organ of state as stipulated in the Directive on conducting business with an organ of state, January 2017.

## **10.2 The role of the Accounting Officer/ designated official in respect of managing conducting business with an organ of state**

10.2.1 The Head of Department/ designated official must

- a). Keep a register/ record of
  - (i) Entities that conduct business with the department; and
  - (ii) Persons who are engaged in supply chain management on behalf of the Department
- b). report any alleged contravention of regulation 13(c) of the Regulations (not to conducting business with an organ of state) and the Directive on conducting business with an organ of state, January 2017 by an employee within 30 days of becoming aware of the allegation to
  - (i) The Public Service Commission;
  - (ii) Department of Public Service and Administration.
- c) Initiate an investigation into the alleged contravention for the purposes of a disciplinary enquiry.

### **10.3 The role of Supply Chain Management in respect of managing conducting business with an organ of state**

9.3.1 Upon receipt of the SBD4 forms, (Declaration of Interest Supply chain Bid document) from any individual or company with the intention of doing business with the Department, an official from Supply Chain Management must ensure that: -

- a). all sections of the SBD4 form are contemplated and the declaration is signed by the company representative (director or member); and
- b). the company whose representative (director or member) is an employee appointed in the public service be prevented from conducting business with the Department.

### **10.4 The role of all employees in managing conducting business with an organ of state**

10.4.1 An employee shall

- a). Immediately disclose to the Head of Department any financial interest in an entity conducting or intend to conduct business with an organ of state.

10.4.2 All employees of the Department are prohibited from conducting business directly or indirectly with an organ of state.

10.4.3 All employees of the Department are prohibited from being a director of a company or member of a close corporation conducting business with an organ of state.

10.4.4 An employee shall resign either from the public service or entity conducting business with an organ of state.

### **10.5 Conflict of Interest in respect of employees with financial interest in an entity conducting business with an organ of state.**

10.5.1 All employees shall be required to declare their financial interests when preparing and/ or presenting submissions to Supply Chain Bid Committees.

10.5.2 The declaration of interest shall be done through eDisclosure for employees on the level of SMS and MMS.

10.5.3 Failure to disclose financial interest by an employee in an entity conducting business with the Department shall be deemed as misconduct.

10.5.4 The Head of Department shall initiate an investigation with regard to failure to disclose financial interest and such investigation shall be for purposes of disciplinary enquiry as contemplated.

## **11. Other remunerative work outside public service**

### **11.1 Conditions for performing other remunerative work outside Public Service.**

The following conditions must be adhered to prior the granting of authority to perform remunerative work outside the public service:

- a). The work must not be performed during official working hours (including lunch time).
- b). The employees must not use the department's tools of trade (including computer ,software, internet, emails, vehicle, cellphone, Landline telephone, uniform, office space, stationaries, and other resources (human and financial) of the department).
- c). No employees shall be granted permission to conduct business with any organ of state or be a director of a public or private company conducting business with an organ of state, unless such employee is in an official capacity a director of company listed in schedule 2 and 3 of the Public Finance Management Act;
- d). Any remuneration, allowance or other reward received by an employee in connection with his/ her work in the public service, other than in accordance with the Public Service Act or this policy, must be paid into the Revenue Fund provided that where the remuneration, allowance or other reward des not consist of money, the value thereof, as determined by the Head of Department in which he or she was employed at the time of receipt thereof, will be recovered from him or her by way of legal proceedings, or in such manner as the Provincial Treasury may approve.
- e). Any unauthorised salary, fee, bonus or honorarium, which may be payable in respect of the services of an employee working at the disposal of any other government, council, institution or body shall be into the Revenue Fund.

### **11.2 Application Process**

The employees must followed the following process when applying for other remunerative work outside the public service:

11.2.1 An employee must first obtain written permission from the Executive Authority or delegate authority before undertaking other remunerative work.

11.2.2 The request to perform other remunerative work should not exceed a period of 12 calendar months.

11.2.3 The employee must complete sections A to D of the application form and submit it to the supervisor to complete section E.

11.2.4 After the supervisor completed section E, the employee will submit the application form to the Ethics Officer.

11.2.5 After receiving the completed application form, the Ethics Officer must analyse all the information to identify any possible, perceived or potential conflict of interest that may arise as a result of the employee undertaking other remunerative work.

11.2.6 The Ethics Officer shall complete section F and submits the application form with his/her recommendation to support or not to support the application to the Executive Authority for a decision.

11.2.7 The Ethics Officer must ensure, as far as possible, that the 30 days period is adhered to.

11.2.8 The Ethics Officer must ensure that the confidentiality of applications are maintained.

### **11.3 Decision Making**

11.3.1 The Executive Authority or delegated authority, when making a decision, must at least take into account whether or not the other remunerative work:

a). Could reasonably be expected to interfere with or impede the effective or efficient performance of the employee's functions; or

b). constitutes a contravention of the Code of Conduct

11.3.2 The decision of the Executive Authority or delegated authority, whether he/she granted permission or declined the request, must be recorded in section G of the application form. If permission was not granted by the Executive Authority or delegated authority, he/she shall record the reason(s) for his/her decision in writing, in section G.



11.3.3 The approval period should not exceed 12 calendar months from date of approval and is only valid for the exact type of remunerative work for which approval was sought and granted.

11.3.4 If the employee wishes to continue performing other remunerative work after the approved period expired, a new application should be submitted 30 days before the expiry date.

#### **11.4 Feedback after the decision of the Executive Authority.**

11.4.1 After the Executive Authority has taken decision on the application, the Ethics Officer shall retain for record purpose the approved application form and inform the applicant of the outcome in writing.

11.4.2 All employees who have been granted approval to perform other remunerative work must attached the certificate of approval when disclosing their financial interests in terms of the Regulations.

11.4.3 A copy of the application forms must be field in the Applicant's personnel file for recording keeping.

11.4.4 The Ethics Officer must capture must capture all steps of the application process contemplated in this policy on the PERSAL system under the fields created specifically for the recording of applications, including if the approval was obtained in terms of sections 30(3)(b) of the Act.

#### **11.5 Non- Compliance**

11.5.1 The Supervisor must quarterly monitor employees who have permission to perform other remunerative work to guard against other remunerative work interfering or impeding the effective or efficient performance of the employee's functions in the department or for possible contravention of the Code of Conduct (which includes amongst others a prohibition on employees conducting business with any organ of state).

11.5.2 All cases of no-compliance must be dealt with in terms of section 16A and 16B of the Act, as well as section 31 of the Act. The outcome must be captured on PERSAL and where applicable, the amount to be repaid/deducted indicated.

11.5.3 The decision made by the Executive Authority or his/her delegated authority shall be corrected (in line with section 5 (7) of the Act) if that decision was based on error of fact, law or fraud. This includes, amongst others, where Applicants omitted facts that may have influenced the decision to grant permission and/or where the Applicant misrepresented the facts pertaining to his/her involvement in other remunerative work.

## **11.6 Transfer and New appointments**

11.6.1 Applications must be reviewed should be transferred or reassigned within the Department.

11.6.2 Employees who are transferred or reassigned within the Department should inform the Ethics Officer within five (5) days after accepting a transfer/ reassignment.

11.6.3 The Ethics Officer must assess the impact of the change for possible, perceived or potential conflict of interest and determine the likelihood of the other remunerative work to interfere with the performance of the employee's functions or if it constitutes a contravention of the Code of Conduct.

11.6.4 The Ethics Officer shall submit his/her assessment to the Executive Authority or delegated authority for reconsideration of the first decision on the application.

## **12. Establishment of Ethics Committee**

12.1. The Head of the Department shall establish an ethics committee or designate an existing committee, to provide oversight on ethics management in the department. DPISA advice departments that the ethics committee should consist of the representative at the level of Director or any designated official with relevant knowledge and experience from the following directorates:

(i) Internal Auditing

(ii) Investigation

(iii) Risk Management

(iv) Legal Services

(v) Ethics Office

12.2. The committee will conduct an oversight role and be accountable for the ethics performance of the department.

12.3. Ethics Committee will give a comprehensive report to the management of the department analysing effectiveness of ethics management system.

### **13. Designated Ethics Officer**

13.1. While the committee will provide strategic direction and oversight, the ethics officer responsibilities are assigned to Chief Risk Officer of the Department. The following are roles and responsibilities of the Ethics Officer:

- a) Develop ethics management plan with measurable objectives for implementing ethics strategy.
- b) Promote integrity and ethical behaviour in the department.
- c) Advise employees on ethical matters.
- d) Coordinate the reporting process of unethical behaviour and corrupt activities to the HOD
- e) Coordinating an ethics risk and opportunity assessment
- f) Ownership and awareness raising on preventive policies such as code of ethics, gift policy, declaration of interests, fraud and corruption policy.
- g) Ensure that ethics training takes place.
- h) Giving ethics advice.
- i) Keeping database of all incidents of unethical behaviour brought to the department.
- j) Investigate reported allegations of unethical conduct.
- k) Management of gift register and financial disclosure or declaration of interest.
- l) Reviewing ethics code, strategy and policy
- m) The ethics officer should submit quarterly reports to the ethics committee.

### **14. DEFAULT**

Any person contravene or fail to comply with this policy there shall be progressive intervention.

### **15. INCEPTION DATE**

The inception date of this policy will be after the approval by the Executive Authority.

### **16. TERMINATION AND REVIEW CONDITION OF THE POLICY**

The policy shall be reviewed every three (3) years in line with MTSF and when there are new developments or amended in terms of legal mandates.

## 17. ENQUIRIES

All enquiries related to this policy should be forwarded to the Chief Risk Officer and Risk Management.

Approved by

  
\_\_\_\_\_

MR. MASEMOLA N.D

MEC: DPRWI

31/08/2020  
DATE