



RURAL METRO BUSINESS CODE OF CONDUCT

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1 Introduction and Scope

1.1 Introduction

This document sets out the Business Conduct (“the Code”) for Rural Metro and augments existing policy.

The spirit of this document is to support ethical conduct by all individuals covered by it as reflected in the scope below.

The Code does not replace Rural Metro’s conditions of service or brigade orders, but should be seen as complementary thereto and as a statement of the values that Rural Metro pursues in its dealings with people and organisations internally as well as externally.

Rural Metro regards its employees as one of its most important resources and the Code will assist in preserving and developing their potential.

1.2 Scope

Compliance with the Code is required of all Rural Metro employees.

1.3 Applicability

The Code also applies to contract labour, consultants, temporary employees, part-time employees, casual employees, occasional employees, directors, customers, suppliers and others acting on behalf of, or dealing with Rural Metro.

Although Rural Metro does not have the legal right to enforce the Code on its goods and service providers, Rural Metro can exercise moral persuasion to gain compliance with the Code or choose not to enter into business relationships with providers that do not comply.

2 Ethics

The term “ethics” refers to standards of conduct, which indicate how a person should behave and what his/her conduct should be, based on moral duties, honesty and virtues arising from the principles of right and wrong. Ethics therefore involve two aspects:

- a. The ability to distinguish right from wrong; and
- b. The commitment to do what is right.

2.1 Individual ethical conduct

Ethical behaviour refers to individual actions by employees which are intended to further the common good of the organisation, as determined by its policies, procedures, directives and business objectives, with which employees are required to comply. If a person is conscious that his/her conduct is against the common good of the organisation or other employees, such conduct is unethical.

Ethical behaviour can also be regarded as a collective behaviour because external stakeholders such as suppliers, communities and the State develop their perceptions about Rural Metro’s commitment to the common good on the basis of the actions and the conduct of Rural Metro employees that they deal with. In this way, excellent ethical business conduct by employees of Rural Metro leads to the collective perception of Rural Metro as an ethical organisation.

2.2 Ethical behaviour and business conduct

Rural Metro conducts its business fairly, impartially and ethically. Hence, the integrity of the employees acting on its behalf underlies all Rural Metro’s relationships, including those with government, customers, suppliers and communities, as well as those between employees. The highest standards of ethical business conduct are required by employees of Rural Metro in fulfilling Rural Metro responsibilities.

Employees may not engage in any activity that could raise questions as to Rural Metro’s integrity, respect for diversity, impartiality or reputation. Ethical business conduct includes workplace relationships between employees in terms of the Country’s constitutional laws and requires respect for constitutional rights in employment, particularly with regard to human dignity, non-discrimination, and respect for diversity, impartiality and reputation.

Anything prohibited by Rural Metro’s policy, law or the Country’s constitution would still be prohibited even if it were done on a Rural Metro employee’s behalf by someone who was not a Rural Metro employee.

All employees are personally responsible for ensuring that their conduct is ethical and should bring possible contraventions to the appropriate Manager’s attention.

3 Rights and Obligations of Rural Metro, Employees and Management

3.1 Rights and Obligations of Rural Metro

As an organisation that provides an essential service delivery to government, businesses and communities, it considers the needs of all stakeholders of paramount concern. Rural Metro will strive to:

- a. Pursue a fair recruitment selection and placement process with due regard to its empowerment and employment equity strategies;
- b. Enter into fair contracts of employment within the parameters of labour law provisions;
- c. Offer market-related salaries and service conditions;
- d. Put performance measurement systems in place that reward achievement and highlight under-achievement;
- e. Promote understanding of cultural diversity between different groups;
- f. Treat people with respect and empathy;
- g. Create a culture of mutual trust;
- h. Create an environment of empowerment and joint decision making by recognising employees' potential and providing:
 - i. a safe and healthy working environment;
 - ii. employment and promotion opportunities to formerly disadvantaged groups;
 - iii. and
 - iv. succession planning / career pathing / upward mobility;
- i. Empower its employees to fulfil their responsibilities and potential (e.g. provision of workplace resources)
- j. Ensure that discipline is seen as positive and necessary and not as a means to punish and victimise;

Establish and maintain fair disciplinary, grievance and labour relations policies; and

Encourage transparent interaction between employer and employees (based on fair and equitable labour laws, basic service conditions and the Country's Constitution) built on sound communication and trust.

Right to dismiss employees if they in breach this code after due process has been followed.

Right to performance from employees.

Right to hold employees accountable for their actions.

3.2 Rights and obligations of Employees

In terms of the Code, all employees have the following rights and obligations:

- a. To be well informed regarding ethical conduct and be sensitised to Rural Metro's standards of ethical business conduct;
- b. To be provided with information (suitable to their job) about the details of the procedures and policies affecting their work, including ethical business conduct, environmental policy and safety rules, and to understand and follow them;
- c. To request information and guidance on ethical conduct when in doubt;
- d. To be made aware of, and alert to, situations that could encourage or allow participation in illegal, improper or unethical actions and to seek guidance to avoid potential challenges;
- e. To consider whether the actions of others may be unethical, and to report conduct which is, or appears to be, in conflict with the Code. Failure to report such action may result in the employee being held accountable;
- f. Not to accept or offer any business courtesies or gifts, either in cash or in kind, in connection with their employment;
- g. To manage their personal affairs in a manner which does not impair, or appear to impair, the objectivity of any decisions that they make on behalf of Rural Metro;
- h. To discourage and resist nepotism or favouritism in the workplace;
- i. To share and declare any information that may result in conflict of interests;
- j. To recuse themselves from any official action or decision-making process which may result in personal gain;
- k. Not to tolerate any form of improper influence, bribery or unethical conduct by suppliers or any other stakeholder and to immediately report such conduct;
- l. To refrain from undertaking remunerative work without permission outside their official duties or using office equipment for such work;
- m. To recognise and treat assets of Rural Metro, including time, materials, equipment and information, with the same respect as if it were your personal property, and to be used solely for the benefit of Rural Metro and not for personal benefit or use, even after working hours;
- n. To perform duties with honesty and integrity, and to the best of one's ability;
- o. To take responsibility and accept accountability for actions and decisions taken (appropriate to their job);
- p. To address any misconceptions or misunderstandings in the workplace, however they arise;
- q. To treat people with fairness, dignity, respect for their rights, courtesy and consideration for their well-being;
- r. To actively discourage any form of victimisation, discrimination or retribution against those who report, have reported or intend to report breaches of the Code;

- s. To communicate openly and honestly, and act with a commitment to achieve a prudent, fair, transparent and responsible result;
- t. To preserve the assets, resources and reputation of Rural Metro and to report any event that may prejudice Rural Metro;
- u. To honour the confidentiality of all matters, documents and discussions regarding Rural Metro and not use or disclose any official information to any person except in the normal course of his/her duties or in a court of law;
- v. To comply with rules, policies, codes and guidelines that apply to Rural Metro;
- w. To ensure that the standards of all professional institutions are upheld at all times;
- x. To keep abreast of technical and functional developments and to avail themselves of ongoing training and self-development ; and
- y. To participate fully and contribute to the improvement of team spirit

3.3 Obligations of Management

In addition to their rights and responsibilities as employees of Rural Metro, Directors, and Managers (and, where appropriate, supervisors) have additional responsibilities arising from their seniority and the nature of their managerial and/or supervisory duties, which include:

- a. To strive to reduce inefficiencies in Rural Metro and establish standards of efficiency in consultation with the other employees of the organisation;
- b. To introduce and maintain in Rural Metro an awareness by all employees that the resources of the organisation, including time resources, are in limited supply and should not be abused;
- c. To market the services and products of Rural Metro accurately;
- d. To determine minimum quality standards for the products and services of Rural Metro and ensure that these products conform to standards;
- e. To provide stakeholders with the ready means of lodging complaints about the quality of Rural Metro's services;
- f. To furnish to an auditor of Rural Metro with all information and explanations which the auditors require for the performance of their functions;
- g. To make a personal commitment to act in accordance with our standards of ethical business conduct, communicating this to subordinates and leading by example;
- h. To establish a working environment that encourages open communication regarding business ethics issues and concerns;
- i. To discuss business ethics issues periodically and review standards of conduct during working hours e.g. at team briefings and forums;
- j. To ensure that appropriate ethics sensitisation and training is provided;
- k. To become familiar with the resources and processes available to assist in the resolution of questions and concerns about business ethics;

- l. To be alert to areas of business risk and establish ways to address potential contraventions of the Code;
- m. To take responsibility for the conduct of employees to ensure that any misconduct, serious, recurrent or widespread enough that action should already have been taken to prevent it, is dealt with speedily and appropriately;
- n. To ensure that employees support a safe and healthy working environment and avoid harming the environment / communities in which Rural Metro operates;
- o. To ensure that the Code, and its contents, is communicated clearly and distributed to all employees.
- p. To acknowledge employees who make a contribution in achieving the values, mission and objectives of Rural Metro, and
- q. To consider whether subordinates are unaware of or have demonstrated insensitivity to the requirements of the Code when delegating discretionary authority

4 Offering Business Courtesies

4.1 Rules for offering courtesies

The Company acknowledges that exchanging courtesies such as modest gifts, meals and entertainment are a common business practices intended to build generosity and establish trust in the business relationship. The occasional exchange of entertainment and gifts, may be appropriate, providing such courtesies are not specifically projected to influence any procurement or sales decision and the Company employee who obtains such gift.

Privileges, bribes or kickbacks of any kind must never be solicited, accepted or offered, either directly or indirectly. This includes, but not limited to money, loans, equity, special privileges, personal favours, benefits or services. Such favours may be considered bribery which infringes the Country's Laws.

Any employee / Service Provider found guilty of the above actions shall be disciplined by the Company and will face criminal action. Furthermore, any person who has offered the Company employees a bribe or who has given a bribe as a result of a request / demand from an employee of the Company, shall have their concluded contracts terminated with immediate effect, face criminal action and shall be excluded from doing business with the Company in future.

5 Human Rights

5.1 Discrimination, Harassment and Harsh Treatment

Associates and employees of Partners have the right to work in an environment which is free from any form of physical or verbal abuse, physical discipline, harassment or discrimination, including on the basis of race, gender, sexual orientation, place of origin, citizenship, creed, political persuasion, age, marital or family status or disability. We promote, and expect Partners to promote, equality and prevent unfair discrimination in the workplace. We employ, remunerate, promote, train, terminate, retire and pay associates on the basis of their ability to do the job, and without regard to race, caste, colour, gender, nationality, religion, age, disability, gender, sexual orientation, union membership, political affiliation or marital status and expect the same of our Partners.

We will not tolerate any threatening, hostile or abusive behaviour by Associates in the workplace or whilst on Group business. Damage to property and/ or harm to people are strictly prohibited.

Associates should report any cases of actual or suspected discrimination, harassment or harsh treatment in the manner set out in our policies and procedures manual.

5.2 Forced Labour

Involuntary labour of any kind shall not be used, including prison labour, debt bondage or forced labour by an external authority. Associates are not required to lodge “deposits” or identity documents and are free to leave their employment after giving the required notice (or reasonable notice where a period has not been agreed / stipulated). We expect our Partners to treat their employees in the same manner.

Lockouts are prohibited and Associates and employees of Partners may not be prevented from leaving any place of work under reasonable circumstances or the conclusion of the official shift.

5.3 Child Labour

Rural Metro and our Partners shall not recruit child labour. Rural Metro shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable him or her to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in line with the International Labour Organisation (ILO) standards.

5.4 Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

5.5 Remuneration and Working Hours

Associates and employees of Partners shall be remunerated for their contribution to the performance of the business in accordance with principles of fairness, responsibility and transparency. Associates and employees of Partners shall be provided with written and understandable information about their employment conditions and remuneration before they enter employment and about the particulars of their remuneration for the pay period concerned each time that they are paid, and minimum legal wage requirements shall be adhered to. No deductions from wages as a disciplinary measure shall be permitted nor shall any deductions from wages not permitted by national law, be permitted without the expressed permission of the associate concerned.

Rural Metro and Partners must ensure the working hours of their employees comply with national laws, collective agreements and the provisions of this Code, whichever affords greater protection for their employees. Working hours, excluding overtime, must be defined by contract, and shall not exceed 48 hours per week. Where no national laws are in place to govern working hours the standard as stipulated by the ILO should be adhered to.

All overtime shall be by agreement and must be applied responsibly, taking into account the extent, frequency and hours worked by individual Associates/ employees of Partners and the workforce as a whole. Overtime must not be used to replace regular employment. Overtime must be compensated at a rate recommended under national law.

Associates/ employees of Partners shall be provided with at least one day off in every 7-day period or, where permitted by national law, 2 days in every 14-day period.

We expect our Partners to apply the above to all people employed in their supply chains.

5.6 Freedom of Association

We comply with all applicable legislation and regulation regarding Associate freedom of association and we engage with Associates on an ongoing basis, to foster and maintain open and honest relationships that allow Associates or Associate representative groups to liaise directly with management on matters that affect them.

We expect our Partners to comply with all applicable legislation and regulation regarding freedom of association in respect of their employees and to ensure that the employees are afforded the same rights.

5.7 Regular Employment

Where possible, work performed by Associates must be on the basis of recognised employment relationship established through national law and practice. Obligations to Associates under labour or social security laws and regulations arising from the regular employment relationship, shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements or apprenticeship schemes, where there may be no real intent to impart skills or provide regular employment. Such obligations should also not be avoided through the excessive use of fixed-term contracts of employment. We expect our Partners to treat their employees in the same manner.

5.8 Substance Abuse

Associates may never use, sell, transfer, manufacture or possess illegal drugs. Associates may not arrive for work under the influence of alcohol or any illegal drug.

5.9 Misconduct Off the Job

Associates must avoid conduct off the job that could impair work performance or affect the Company's reputation or business interests. Associates are required to advise their line managers of all criminal arrests or convictions that might negatively impact their ability to perform their job, the Company's reputation or the safety of Associates and stakeholders.

In addition to the above, Associates have a duty to report all acts of misconduct they have observed (or have evidence of) a fellow Associate or Partner committing. In the event that an Associate fails to assist the Company in identifying the Associate or Partner they are violating their duty of good faith and this may lead to disciplinary action which could include dismissal.

6 Conflicts of Interest

6.1 Rules regarding potential conflicts of interest

Rural Metro Conditions of Employment makes it clear that employment on the fixed establishment with Rural Metro is on a full time basis. Hence prior communication to and approval from management at an appropriate level is required before doing any of the following:

- a. Holding a passive investment interest (either directly or indirectly) in any supplier or customer;
- b. Acting as an officer, director, partner, consultant, representative, agent, adviser or employee of a (potential) supplier, customer, or competitor of Rural Metro;
- c. Accepting nomination to public office (this may only be done upon securing written consent from the Chief Executive Officer);
- d. Being involved in any capacity in the conduct of any business that is involved in technical areas or product lines that are similar to those of or in conflict with the interests of Rural Metro and its Partners;
- e. Being involved in any capacity in the conduct of any business whose customers include Rural Metro and its Partners, its customers or its suppliers; and
- f. Accepting employment for gain outside of normal working hours, which in any way interferes with work performance, could be in breach of their contract of employment.

Such communication is ethical and covers employees in respect of negative perceptions which could arise.

Rural Metro allows employees to participate in non-profit industrial, professional, civic, or charitable activities, as these are generally not viewed as constituting a conflict of interest.

All employees must declare all actual or potential conflicts of interest.

7 Relationships with Colleagues

The following rules are to be observed by all employees:

- a. Not to make false accusations against a fellow employee;
- b. Recognise fellow employees' rights to freedom of association,
- c. Employees are required to show respect for the dignity of all their colleagues;
- d. They are prohibited from discriminating against fellow employees in word or deed on the basis of race, gender, language, religion, sexual orientation or on account of a disability;
- e. Employees may not hinder Rural Metro's employment equity initiatives;
- f. Employees may not attempt to intimidate or irregularly influence fellow employees in any way, nor be so influenced by others.

8 Relationships with Suppliers

The following rules apply particularly to employees who have direct contact with outside suppliers or who are indirectly involved in source selection or evaluation (procurement / purchasing / tender evaluation):

- a. Inform a supplier of any bribe or attempted bribe by the supplier's personnel;
- b. Terminate dealings with any supplier which bribes, or attempts to bribe, employees of Rural Metro;
- c. Ensure that no bribe is paid to personnel of a supplier of Rural Metro;
- d. Have regard for the interests of Rural Metro's creditors when requesting an extension of time in which to pay;
- e. Purchase contracting must be made on the basis of quality, service, price, availability and past performance;
- f. Business and personal activities must be kept separate;
- g. The proprietary data of a supplier or potential supplier must be protected;
- h. Employees are responsible for complying with supplier-imposed limitations governing the use of supplier information, including documents and computer software;
- i. Rural Metro's purchasing power should not be misused for personal benefit to buy goods, materials or services at terms not available to all employees;
- j. Information about Rural Metro that is restricted, proprietary or sensitive must not be revealed to a supplier or potential supplier unless authorised;
- k. All employees, contract labour, consultants and others acting for Rural Metro are prohibited from providing, attempting to provide, or offering to provide a kickback; and from soliciting, accepting, or attempting to accept a kickback;
- l. No form of improper influence, bribery or unethical conduct by suppliers or customers is to be tolerated and such conduct should be reported; and
- m. Employees who make, or could influence, purchasing decisions should not be involved in the solicitations on behalf of charitable, civic, or other organisations, or gifts of money or time from current or potential suppliers.

9 Health, Safety and Environmental Protection

Rural Metro is committed to achieving environmental, health and safety excellence. Rural Metro strives to provide a safe and healthy working environment and to avoid harming the environment and the communities in which it operates.

All employees can contribute to Rural Metro's efforts in this regard by:

- a. complying with environmental, health and safety laws and regulations;
- b. taking measures to prevent workplace injuries and illnesses, and providing a safe and healthy working environment;
- c. reducing the use and release of toxic and hazardous materials; and
- d. Co-operating with the public, the government, and other interested parties to develop regulatory and public policies to protect public health and the environment.

10 Use of Rural Metro's Stakeholder, Supplier and Other Resources

10.1 Including Information, Intellectual Property and Computer Equipment

Rural Metro's resources are to be used for the benefit of Rural Metro and ultimately all its stakeholders. They include time, materials, equipment and information and they should not be used for personal benefit or non-company purposes, even after working hours.

Employees must not attempt to gain benefits or discounts, through Rural Metro's standing or bargaining power, that would not normally be available to them.

10.2 Physical assets of Rural Metro

The assets and property of Rural Metro, its customers and its suppliers should be treated with the same respect as personal assets and property.

Materials and equipment of Rural Metro must remain on Rural Metro controlled property, unless a manager authorises their use in another location in Rural Metro's interests.

Proper measures should be taken for the storage and safeguarding of Rural Metro information to prevent unauthorised access, use or removal by any means and in any form (e.g. electronic, optical, digital, or hard copy).

10.3 Confidentiality of information

No internal information regarding Rural Metro's activities, strategic and business plans may be given to outside parties without the prior consent of:

- the Chief Executive Officer; or
- the General Manager; or
- the Head: Finance in respect of financial information; or
- the Head: Human Resources in respect of human resources- related information; or
- any other Director where appropriate.

Rural Metro is responsible for properly recording and reporting financial information, and for maintaining effective systems of internal control. All accounting, reporting and control procedures established by Rural Metro must be followed. It is important to be accurate, timely and complete in preparing and maintaining records and reports.

10.4 Privacy of employee information

Rural Metro is obliged to record and maintain legally required personal data for payroll, provident, union membership, medical etc. Such information must be treated as confidential and used only for legitimate Rural Metro purposes. An employee has the right to correct errors in his or her personal file.

10.5 Intellectual property and proprietary information

Rural Metro requires the protection of intellectual property and proprietary information. This includes patents, trademarks, copyrights and research and trade secrets. It also applies to any other information over which Rural Metro has control. The obligation not to disclose proprietary information still applies after an employee has left the employment of Rural Metro.

10.6 Computer security

Hardware, software and data processed by computer and shared electronically or otherwise must be adequately safeguarded against damage, loss, alteration, theft, fraudulent manipulation, unauthorised access to and disclosure of information. Strict adherence to all policies and standards addressing the protection of Rural Metro's data resources and data networks is required of all employees.

Each employee is responsible for the protection and confidentiality of passwords, access id's and any other access information of systems and networks. All security measures and internal controls that have been established for safeguarding the integrity and validity of computer systems, data and software must be complied with.

Unauthorised duplication of copyrighted computer software violates the law. Strict compliance with all licence or purchase terms regulating the use of any software acquired or used must be maintained.

10.7 Whistle Blowing and Retaliation

Whistleblower is a critical tool for protecting individuals who report activities believed to be illegal, dishonest, unethical, or otherwise improper.

The organization will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Corporate Services Manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Whistleblower protections are provided in two important areas: confidentiality and retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defence.

10.8 Export Control and Economic Sanctions

Rural Metro will strictly comply with applicable laws for the import and export of goods, services and information. Furthermore, we will comply with provisions of the applicable sanction regulations.

Appropriate export procedures and controls shall be implemented for the export of technologies and goods regulated by the laws and regulations of each country and region.

10.9 Principles regarding Counterfeit Parts

Rural Metro is committed to preventing the introduction of counterfeit materials. Rural Metro will plan, implement and control processes for the prevention of counterfeit or suspect counterfeit materials and their inclusion in product(s) delivered to our customers. The objective is to avoid counterfeit parts entering in Rural Metro's supply chain and products. This control plan shall be maintained, updated and sustained based on evolving counterfeiting techniques and trends.