

ECAT ONLINE CODE OF CONDUCT POLICY

Policy Area	CODE OF CONDUCT	
Approved Date		
Approved By	The Governing Authority/Managing Director	
Responsible Manager	Complaints Officer/Managing Director	
Current Version	27.02.21	2021

ECAT ONLINE will conduct its business in strict compliance with applicable laws, rules, regulations and policies, procedures and guidelines, with honesty and integrity, and with a strong commitment to the highest standards of ethics.

We have a duty to conduct our business affairs ethically and spirit of the law.

We thoroughly enforce our policies and practices about protection of employee health and safety. We provide a work environment in which employees are free to express concerns or report violations without fear of victimization.

These standards of ethics and conduct are at the foundation of the Company's business operations. It is the obligation of employees at all levels to adhere to these standards.

The purpose of this Code is to provide information and guidance for all employees on the basic legal and ethical requirements they must comply with during their work for ECAT ONLINE.

1. General Principles

A fundamental principle governing our activities is compliance with local laws. All employees are obliged to observe the statutory and supervisory regulations pertaining to our operations. This also applies to the internal instructions and directives notified to them, in advertently, this extends to avoiding any involvement in transactions whose evident intention is to evade statutory or supervisory regulations.

Every employee is obliged to uphold ECAT ONLINE's reputation and to avoid doing anything that could harm the ECAT ONLINE brand. We expect personal integrity and reliability from our employees.

Member: H GAUTHIER

Registration No. CK2002/048631/23

www.ecatonline.co.za Tel: 012 993 2870 Tel: 012 993 2240 Fax: 086 528 9873

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Non-compliance with statutory or supervisory regulations or contraventions of this Code may harm the reputation of ECAT ONLINE. In addition, they may lead to public sanctions (fines, intervention in our business operations). A contravention of the Code may also constitute a breach of the contract of employment or service. Beyond this, there may be the threat of sanctions under criminal law if the breach constitutes a criminal offence.

2. Compliance and Verification

Every employee is responsible for complying with the rules set out in this Code of Conduct. The management should ensure that their staff are familiar with the content of the Code and observe the rules and principles of conduct applicable to them.

ECAT ONLINE expects every employee to report any violation or apparent violation of the Code.

The Company strongly encourages employees to work with their managers in making such reports. Employees can consult on ethical questions with, and report violations through, any one of the following channels:

- Head of Internal Audit, or
- Head of Forensics, or
- Their own or any other manager, or

Prompt reporting of violations is in everyone's best interests.

Employee reports will be handled as confidentially as possible. No employee will suffer indignity or victimization because of a report he or she makes; indeed, in South Africa, the Protected Disclosures Act ensures this protection. The person making a report will be given anonymity if he or she so requests.

This code provides guidance in specific situations, but it is not possible to provide guidance for all situations that may arise. Therefore, it is the individual employee's responsibility to exercise good judgment, to act in a manner that will reflect favourably upon both the company and the individual. If an individual is not sure what action to take or the consequences of an intended action, they should ask from any of the reporting channels above

Culture

Culture is perceived to be "How we do things around here".

We are:

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- Supportive and caring.
- Self-driven and people orientated.
- Hands on and competitive.
- Risk conscious and reward good performance.
- Thrive for excellence and nature talent.
- Have an open-door policy and value relationships.

3. Values

ECAT ONLINE's values are entrenched in the culture of the entire company. The value system incorporates; Accountability, Service excellence, Respect and Integrity.

The core values of ECAT ONLINE:

- **Transparency**- To ensure complete transparency in the practise and build trust by providing regular updates on the project.
- **Commitment**- At the core of commitment is reliability and personal responsibility. We value the ability of our staff and organization to honour our commitments, to clients and to each other.
- **Service Excellence** - Generating excellence in the field of web development and SEO. we strive to provide the highest quality service to our clients.
- **Innovation** - We innovate new web ideas and technology for online businesses.
- **Integrity** - Honesty and trust are central to integrity, as is consistency in our business.

4. Non-discrimination

We expect all employees to observe every individual's personal dignity, privacy and personality rights. We do not tolerate any discrimination, (on grounds of age, sex, ethnic origin, nationality, political opinion, race, religion or the like), sexual harassment, other personal harassment or insulting behaviour, nor do we tolerate any intimidation or violence or the threat thereof.

5. Fair dealing with business partners

ECAT ONLINE is dedicated to developing, producing, and delivering financial products and services of the highest quality, at a fair and risk-adequate price, that meet or exceed the requirements of clients. This can be accomplished only by a continuing dedication to fair business dealings with policyholders/clients, suppliers and intermediaries, and a strict adherence to all contractual obligations.

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ECAT ONLINE is committed to fair and open dealings with our business partners. We aspire to give our clients the best possible service/advice and to provide them with all the information they need to make an appropriate, reasonable decision in their interests.

6. Conflicts of interest

All employees have a duty to avoid financial, business, or other relationships which might be opposed to the interests of ECAT ONLINE or might cause a conflict with the performance of their duties. Employees should conduct themselves in a manner that avoids conflict between their personal interests, or the interests of a member of the employee's immediate family or close associate / friend, and those of ECAT ONLINE. Employees may neither accept nor offer or grant unjustified advantages in conjunction with their professional activities. Unavoidable personal conflicts of interest must be disclosed to management.

A conflict of interest may arise in many ways. Examples include the following:

- Employment by a competitor, regardless of the nature of the employment, while employed by or contracted to ECAT ONLINE.
- Acceptance of gifts or services exceeding the nominal value of R5 000 from those seeking to do business or are doing business with ECAT ONLINE.
- Placement of business with a firm owned or controlled by an employee, family or friends.
- Ownership of, or substantial interest in, a company which is a competitor or a supplier or a business partner of the ECAT ONLINE.
- Acting as a consultant to ECAT ONLINE client or supplier etc.

Apparent conflicts of interest can easily arise. Any employee who feels that he or she may have a conflicting situation, actual or potential, should report all pertinent details. It is important to note that a conflict of interest does not resolve itself through its declaration, and the responsibility to act responsibly within such a conflict remains with the employee.

Avoiding conflicts between private and professional interests. The following rules are to be complied with:

- All employees must ensure that their private interest do not conflict with those of the company.
- Decisions concerning contracts and the placing of orders for the company must be based solely on competitive factors.
- Employees require the prior approval of their executive manager before representing the company in transactions in which they themselves or their family members (spouses, civil

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partners, children or other relative) including close family friends have a significant economic interest.

- Employees may not pursue secondary professional activities or other business interests of their own without the prior approval of the company.

7. Corporate opportunities

No employee may:

- take for himself or herself personally opportunities that are discovered using the Company's property, information or position;
- use the company's property, information or position for personal gain; or
- compete with the Company.

Employees will promptly inform their manager, or via one of the reporting lines, any business opportunity, prospect, proposed investment, or other potential transaction that becomes known because of that person's position with the Company and is of a nature that might reasonably be of interest to the Company. No employee may pursue such opportunity, prospect, investment or other transaction for his or her personal account or to benefit any other business interest without first offering it to the Company and receiving the written approval of their MD to pursue such opportunity. Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

8. Treating customers fairly (TCF)

- Employees are expected to comply with the outcomes of TCF as outlined below:
- Embrace culture - Customers should be confident when dealing with ECAT ONLINE that the fair treatment of customers is central to ECAT ONLINE have culture.
- Accurate targeting – ECAT ONLINE's products and services marketed and sold in the retail market are designed to meet the needs of our customers and are targeted accordingly.
- Clear information - Customers are given clear information and are kept appropriately informed before, during and after the point of sale.
- Best advice - Where customers receive advice, the advice is suitable and takes account of their circumstances.
- Improved delivery - Products and associated services provided to our customers are of an acceptable standard and perform as promised.

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- Post Sales treatment - Customers do not face unreasonable barriers after the sale to change any product, switch to an alternative service provider, submit a claim or lodge a complaint.

9. Protection of personal information (PoPI)

- As part of this code, employees are required to comply with the conditions for lawful processing of personal information.
- Accountability – Employees are expected to comply with the requirements of the PoPI Act from inception of any transaction and throughout the life cycle of processing personal information.
- Processing limitations – Processing of data must be adequate, relevant and not be excessive relative to the purpose of which the processing was undertaken.
- Purpose specification – Employees should specify the purpose of data collection, once the purpose has been achieved, the information may no
- longer be retained except if retention is required by law or contractually. If retained after processing, the records must be safeguarded against use for other purposes.
- Further processing limitations - Employees should limit further processing of the personal information and if done it must be in accordance with or compatible with the purpose for which it was originally collected.
- Information quality - Employees should ensure quality information/ accuracy, make sure that the necessary quality controls are in place when collecting or making any changes to information.
- Openness - Employees should be open about information collected. The responsible employee must inform the data subject what information is being collected, the reason, whether supplying the information is mandatory or voluntary, consequences of not supplying the information and whether it will be transferred to a third party.
- Security safeguards - Employees should secure the integrity of the information by identifying reasonably foreseeable internal and external risks to information, implement and maintain appropriate safeguards against such risks.
- Data subject participation - Data subjects can at any time request whether ECAT ONLINE holds any of their personal information and may correct or delete any information that is inaccurate, out of date, misleading or that was obtained illegally.

10. Policyholder Protection Regulation (PPR)

- At ECAT ONLINE, we are fully aware of provision of PPR in our business and have appropriate policies and procedures in place to achieve the fair treatment of policyholders.

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- The fair treatment of policyholders encompasses achieving at least the following outcomes:
- Our clients can be confident that they are dealing with an insurer where the fair treatment of policyholders is central to our culture;
- ECAT ONLINE products are designed to meet the needs of identified types, kinds or categories of clients and are targeted accordingly;
- ECAT ONLINE clients are given clear information and are kept appropriately informed before, during and after the time of entering a policy;
- where policyholders receive advice, it should be suitable and takes account of their circumstances;
- policyholders are provided with products that perform as insurers or their representatives have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect; and
- policyholders do not face unreasonable post-sale barriers to change or replace a policy, submit a claim or make a complaint.
- Rule 1.4(a) chapter 1 of PPR entitles a member to have confidence that the group scheme concerned is dealing with an insurer where the fair treatment of its members is central to ECAT ONLINE culture;
- For purposes of achieving rule 1.4(c) of the same chapter, ECAT ONLINE will have arrangements in place with the policyholder concerned that facilitate and support the provision of the required information by the policyholder to the member;
- In the case where advice is provided to the policyholder rather than the members, rule 1.4(d) requires that the advice should be suitable in relation to both the circumstances of the policyholder and the known or reasonably assumed circumstances of the members; and
- ECAT ONLINE will provide products that are suitable and perform as the members of the group scheme and or policyholders expect and as lead and advised by the ECAT ONLINE representatives as stated according to rule 1.4(e) of PPR policy.
- For purposes of achieving rule 1.4(f) ECAT ONLINE will have arrangements in place with the policyholder concerned that facilitate and support the member's ability to make changes in relation to the member's interest in group scheme (to the extent permitted in terms of the rules of group scheme) or to submit claims or make complaints without unreasonable barriers.

11. Products

ECAT ONLINE will do a research in a form of surveys to clients to determine adequate information on the needs of identified types, kinds or categories of policyholders or members. These surveys will help us to improve our products.

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- ECAT ONLINE will undertake a thorough assessment, by competent persons with the necessary skills, of the main characteristics of a new product, the distribution methods intended to be used in relation to the product and the disclosure documents related thereto to ensure that the product, distribution methods and disclosure documents:
- Are consistent with ECAT ONLINE's strategic objectives, business model and risk management approach and applicable rules and regulations;
- ECAT ONLINE target the types, kinds or categories of policyholders or members for whose needs the product is likely to be appropriate, while mitigating the risk of the product being used by types, kinds or categories of policyholders or members for whom it is likely to be inappropriate;
- Consider the fair treatment of customers; and
- That are subject to white labelling arrangements, undertake due diligence assessments in respect of the governance, resources and operational capability of the persons with whom the insurer has such arrangements and ensure compliance with paragraph (b) above.
- That comprise underlying financial instruments or other assets, undertake due diligence assessments in respect of the underlying financial instruments or other assets and ensure compliance with paragraph (b) above.

12. Advertising

The Company's advertising will not be mere commendation and praise. There will be correct, and balanced and not misleading advertising.

ECAT ONLINE advertisements will be aligned with the rules of PPR. Each advertisement will:

- (a) be factually correct, excluding aspects of an advertisement constituting puffery;
- (b) Provide a balanced presentation of key information whereby the descriptions in an advertisement must not exaggerate benefits or create expectations regarding policy performance or the performance of related services that the ECAT ONLINE does not reasonably expect to achieve:
 - ECAT ONLINE descriptions in an advertisement, in respect of a specific policy or related service, must include key limitations, exclusions, risks and charges, which must be clearly explained and must not be worded positively to imply a benefit; and
 - Where and how the additional information may be accessed e.g. ECAT ONLINE website.
- (c) must not be misleading.

Please refer to annexure B for advertising and marketing initiatives and all these initiatives will be guided by PPR rules mentioned above.

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13. Entertainment, gifts & payments

ECAT ONLINE products and services must be above reproach, without any hint that favourable treatment outside ethical business practice was sought, received, or given based on the giving or receiving of gifts, entertainment, favours, hospitality, or other gratuities.

Similarly, purchase of supplies, materials, services from suppliers, and subcontractors must be accomplished in a manner that preserves the integrity of a procurement process based on quality and performance.

ECAT ONLINE specifically prohibits offering, giving, soliciting, or receiving any form of bribe or kickback(s); these are criminal acts.

Public officials, politicians and other representatives of public institutions may not be given gifts, gratuities or invitations without the prior approval of the Managing Director (MD).

13.1. Invitations

Invitations issued:

- Over-generous invitations can put guests in a position in which they feel influenced in making their decisions. Thus, maintenance of a client relationship stops short of any act that might create a suspicion of improper influence on an imminent business decision.
- Normal business lunch and dinner invitations are generally acceptable, as they are often a forum for business discussions and are part and parcel of "normal business practice".
- All other types of invitation, particularly events primarily involving entertainment or pleasure, must be assessed very carefully if they are appropriate and whether such events are "normal business practice". It should be borne in mind that opinions on what is "normal" or not have changed materially over time and a more critical view is taken of many forms of entertainment than in the past. Moreover, many of our business partners have a code of conduct that does not allow them to accept certain types of invitation. These factors should also be considered.
- For invitations of any other exceptional type with a per person cost value exceeding R1 000, the staff member must seek approval before inviting by submitting a motivation, approved by the MD.
- The business necessity and appropriateness of invitations to all other pure entertainment events or events clearly of a primarily entertainment nature will be assessed very carefully.

Invitations received:

In principle, the same rules apply to the acceptance of invitations as to their issue. Thus, the normal reasonable examples given above under invitations issued may be accepted without further formality.

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The following rules apply to all other invitations:

Accepting invitations of any other exceptional type, where the estimated per person cost value exceeds R1 000, the invited staff member must seek approval before accepting by submitting a motivation, approved by their MD.

13.2. Gifts

Gifts received

Acceptance of modest gifts (under R1000) is admissible and must be reported to the Managing Director.

Any gifts exceeding the value of R1000 should be recorded in the gift register (within 10 days of receipt or as soon as practical to do so) and handed over to the manager who will make decision about the destination of the gift). The MD will decide on their further use (usually donation to charity where appropriate).

Gifts presented

The appropriateness of giving a gift should be carefully considered.

- There are instances in which the giving of a gift in a purely commercial transaction is appropriate and, perhaps, expected. Accordingly, a gift of nominal value may be given provided that the fair market value of the gift does not exceed the nominal value of R1 000.
- Any extraordinary gift needs prior approval of the MD.
- Integrity of information, financial books, records and communication
- The Company's financial statements and all books and records on which they are based must reflect accurately and truthfully all transactions of the Company, be they internal or external.
- All disbursements of funds and all receipts must be properly and promptly recorded.
- No undisclosed or unrecorded fund may be established or kept for any purpose. No false or artificial statements or entries may be made for any purpose in the books and records of the Company or in any internal or external correspondence, memoranda, or communication of any type, including telephone or email communication.
- No employee will take any action to fraudulently influence, coerce, manipulate or mislead any independent auditor of the Company's financial statements for rendering the financial statements misleading.

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- Penalties for violations in this area could be severe for the Company as well as the employee involved.
- Any official comments to the media or statements to public bodies and supervisory authorities may only be given by the contact persons responsible for this.
- If employees make public appearances or take part in discussions in such a way that they could be perceived to be acting as representatives of ECAT ONLINE or without having been authorised to do so, they must make it clear that they are acting in their private capacity.

14. **Company assets & policies**

Our corporate assets include not only material assets and property but also intangible goods (intellectual property such as software products), information, and the ideas and knowledge of our employees.

Every employee is charged with the duty to preserve the Company's assets: its proprietary information, property and equipment.

The use of any company assets for any unlawful or improper purpose is strictly prohibited. Company assets are not maintained for use by employees for non-business-related purposes. All employees are responsible for the safekeeping of such property and no items of whatever value shall be removed from the premises without prior permission. Further, it is the responsibility of every employee to ensure that they are not negligent and do not deliberately cause damage to company property or that of other employees.

15. **Company policies & procedures**

Employees are expected to uphold the ECAT ONLINE principles and values as part of the Ethical Code (These are available in the Ethics Policy).

Employees are bound by, and are obliged to adhere to, all Company policies and procedures. The same applies to any amendments to such policies and procedures. It is incumbent upon the employee to familiarize themselves with the Company policies and procedures.

Employees must act honestly and in good faith in respect of both fellow employees and clients of the Company. Employees must act within their powers and in the interests and for the benefit of the

Company. By acting within these parameters, clients and competitors are assured of the integrity of the Company, whilst employees are afforded the opportunity to use their unique qualities and skills creatively in the positive development of the Company.

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16 . Social media Policy

The purpose of this section is to create awareness of some of the opportunities/challenges that social media presents, as well as making ECAT ONLINE staff aware of how to manage the risks associated with the use of social media.

The following principles apply to professional use of social media on behalf of ECAT ONLINE as well as personal use of social media when referencing ECAT ONLINE;

- Employees need to know and adhere to the ECAT ONLINE's Code of Conduct and other company policies when using social media about ECAT ONLINE.
- Employees should be aware of the effect their actions may have on their images, as well as ECAT ONLINE's image. The information that employees post or publish may be public information for a long time.
- Employees should be aware that ECAT ONLINE may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to ECAT ONLINE, its employees, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, racist, sexist, proprietary, harassing, libellous, or that can create a hostile work environment.
- Employees are not to publish, share, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential,
- Employees should check with the Human Resources department and/or Compliance department.
- Subject to applicable law, after-hours online activity that violates ECAT ONLINE's Code of Conduct or any other company policy may subject an employee to disciplinary action by ECAT ONLINE.

17. Money laundering and financial crime

- All employees must comply with the requirements of the Financial Intelligence centre Act (FICA). ECAT ONLINE employees and resources should not be misused for money laundering or other illegal purposes. The general principle applying here is that, prior to conducting a business transaction, employees procure enough information about the client's business environment, the client itself and the purpose of the intended business.

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- Where there are grounds for suspicion, it must be reported to the head of Risk Management, head of Internal Audit or the head of Forensics for investigation. Transactions that are illegal must be rejected.
- Further details on money laundering and the FICA Act are available at request from the Compliance Division.

18. Safety, Health and Environment

ECAT ONLINE is committed to providing a safe and healthy workplace for employees and for visitors to its premises. This commitment can only be met through the awareness and cooperation of all ECAT ONLINE employees. Each employee has a responsibility to abide by safe operating procedures, and to guard their own and fellow employees' health. In keeping with this spirit, employees are encouraged to report to their manager conditions which they perceive to be unsafe, unhealthy or hazardous to the environment.

ADOPTION OF POLICY

Adopted by:

Managing Director:

Date:

19. Compliance Certificate for all employees

Date:

I have carefully read the ECAT ONLINE Code of Conduct and I fully understand its contents. I hereby accept responsibility for adhering to and complying with the standards and intention of the code.

I will report compliance and legal violations, which I know of, or suspect are about to occur. I understand that my failure to abide by our code of conduct may result in disciplinary action, up to and including termination of employment with the company.

I hereby certify that, to the best of my knowledge, neither I nor any member of my immediate family, has engaged in any activity, or has any interest, which violates the Code of Conduct, other than the possible or actual exceptions to the code described below. If a change in circumstances occurs which should be reported in accordance with the code, I will promptly file a revised compliance certificate.

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Exceptions or declaration comments (attach additional sheets if necessary):

Name (block letters):

Business unit:

Signature:

Date:

Employees are required to sign this certificate at the commencement of employment, and thereafter annually in January. It is to be lodged with the Compliance department within 10 days upon commencement of employment, and by 31st January each year.

20. Compliance Certificate for Directors of the ECAT ONLINE Board

Date:

I have carefully read the ECAT ONLINE Code of Conduct and I fully understand its contents. I hereby accept responsibility for adhering to and complying with the standards and intention of the code.

I hereby certify that, to the best of my knowledge, neither I nor any member of my immediate family has engaged in any activity, or has any interest, which violates the Code of Conduct, other than the possible or actual exceptions to the code described below. If a change in circumstances occurs which should be reported in accordance with the code, I will promptly file a revised compliance certificate.

Exceptions or declaration comments (attach additional sheets if necessary):

Name (block letters):

Signature:

Date:

Directors are required to sign this certificate at the commencement of their directorship, and thereafter annually in January. It is to be lodged with MD office within 30 days upon commencement of directorship, and by 31st January each year.

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