

## **SMS EMPLOYEE CODE OF ETHICS**

1. **General.** One of the core values of SMS is to promote a family-like bond within its employees. It is therefore important to lay down Codes of Conduct and Ethics. Both these documents are issued to all employees upon employment. Employees are not only expected to abide by these in letter and spirit but also further promote these within their respective spheres.
2. **Purpose.** The purpose of Code of Ethics is to spell out the contours of personal and professional conduct expected from SMS employees at all levels. The Code provides a basis for maintaining an environment that is productive, positive, enjoyable, safe and free from harassment and discrimination. It provides clear guidelines and standards for dignified and mature behaviour.
3. **Basis.** The Code of Ethics is based on the organisational values of integrity, compassion, courtesy, fairness and mutual respect. It implies that the behaviour and dealings of employees will be reflective of these values.
4. **Responsibilities of Managers / Supervisors.** The managers are responsible for:-
  - a. Behaving in a manner that is consistent with the provisions of the Code of Ethics
  - b. Educating employees in their teams about the Code.
  - c. Providing appropriate training and / or performance counselling to ensure the required standards are met.
  - d. Reporting any departure from the Code of Ethics.
5. **Responsibilities of Employees.** All employees are personally responsible and accountable for their own performance, dealings and behaviour consistent with the provisions of the Code of Ethics.
6. **Behavioural Expectations.** All persons working on behalf of SMS are expected to exhibit the highest level of professionalism, respect for law and the rights of others. Any untoward behaviour internal and external to SMS should be immediately reported.
  - a. **Act in Best Interest of SMS.** Employees are expected to act honestly in their dealings with clients, suppliers, contractors and fellow employees and to act in the best interests of the SMS.

- b. **Misuse of Facilities and Equipment.** Employees should take all possible care when using SMS property. Unless explicit permission has been granted, SMS resources are not to be used for private purposes.
  - c. **Privacy and use of personal and official information.** Employees have an obligation to ensure confidentiality, prevent unauthorised access and security of official information for which they are responsible.
  - d. **Records Management.** Employees must not remove, copy or temper with documents from official files or in any other manner, interfere with official documents or files.
  - e. **Conflict of Interest.** If an employee becomes aware of the potential for conflict of interest he must notify his manager of the perceived or actual conflict of interest. Employees should avoid conflict of interests that may reflect negatively on SMS or its clients.
  - f. **Acceptance of Commissions, Gifts or Benefits.** Employees should not accept job related gifts or a benefit from a person or organisation outside the SMS if the intent of the gift or the benefit is to influence the employees' job-related functions or give the perception of a conflict of interest to the detriment of SMS interests. The employee must inform his / her manager of any gifts, gratuities and / or benefits received by him / her in the line of duty.
  - g. **Use of Influence to Secure Advantage.** No employee shall use influence or interest of any person to obtain promotion, transfer or other advantage.
  - h. **Employee / Client Boundaries.** The term 'employee / client boundaries' signifies the importance attached to maintaining correct disposition in this relationship. Employees are expected to maintain proper boundaries with clients.
  - i. **Smoking.** Employees may smoke in their own time at permissible spots only.
7. **Professional Behaviour – all employees should:**
- a. Comply with legal, regulatory and voluntary obligations and Company policies.

- b. Respect human rights and project a positive image of SMS in the communities it serves.
  - c. Fulfil their obligations towards Occupational Safety & Health codes and policies
  - d. Maintain adequate documents to support decisions made.
  - e. Not harass or discriminate against other persons on the basis of sex, race (including colour, ethnic background or national identity), marital status, disability, political / religious beliefs, or age
8. **Unreasonable Behaviour**. Following are examples of unacceptable behaviour and must be avoided:-
- a. Physical or mental abuse
  - b. Verbal abuse
  - c. Shouting / isolating behaviour
  - d. Giving employees impossible assignments
9. **Use of Alcohol and Drugs**
- a. Employees should not be under the influence of alcohol or any other substances while they are at work.
  - b. Possession, use or trafficking of illegal drugs on the premises is not permitted. The SMS premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces.
  - c. Management should be informed of any use of controlled substances for medical reasons that might impact job performance.
10. **Harassment**. Harassment is any type of behaviour that the other person does not want. Such behaviour offends, embarrasses or scares persons working on behalf of the Company as well as others they interact with. Harassment does not have to be a series of incidents or an ongoing pattern of behaviour. Harassment of others is not acceptable and all harassment incidents will be reported immediately.
11. **Racial and Religious Vilification**. Racial and religious vilification is a form of harassment and discrimination which is unacceptable. All reported incidents will be investigated.
12. **Public Conduct and Media Contact**
- a. Employees making comments in a public forum on any matter relating to the SMS must act in keeping with the values, norms and reputation of the SMS.

- b. Employees are not permitted to speak with media representatives without first receiving clearance from the CEO.
  - c. Information posted on social media sites or transmitted in emails is considered public distribution of information and should not have adverse effect on SMS or its clients.
13. **Avoid**
- a. Use of SMS letterhead when corresponding on personal or other matters not directly related to SMS
  - b. Unauthorised use of SMS logos, falsifying, manipulating or destroying business records without specific authorisation
  - c. Using SMS equipment for personal commercial gain
14. **Use of E mails.** Staff may only use e-mail and web browsing for work related purposes and that all e-mail and web access logs will be monitored for compliance.
15. **Breaches of the Code.** SMS is committed to the standards set out in the Employee Code of Ethics. All Managers / employees are expected to abide by the Code in true letter and spirit.