



# COMPLIANCY POLICY / CODE OF CONDUCT

Document: SIQ-CMP-COC-003	Effective date: 21 Apr 2016	Revision date: 31 Oct 2018	Revision version: 3.1
	Updated by: Siphamandla	Reviewed by: Andile	Approved by: Trevor

## Code of Conduct (“Code”) for SiyaqUber (Pty) Ltd, its affiliates and/or its subsidiaries

### Policies and Procedures

#### 1. Preamble

SiyaqUber is a Broad-Based Black Economic Empowerment “BEE” validation service partner to Uber through providing empowerment driven opportunities within the Uber for Business platform. SiyaqUber works in conjunction with Uber to ensure driver partners are able to attract and deliver Preferential Procurement and Supplier Development points for corporate clients.

SiyaqUber will consciously seek to protect its integrity, reputation and image from any and all forms of corruption, risk or harm that could arise from illegal, immoral or unethical methods and/or practices. All SiyaqUber approved driver partners are expected to uphold a high standard of behaviour expressed in terms of this Code. SiyaqUber also expects all other stakeholders with whom it would engage from time to time, for example, its suppliers, commercial partners, media, etc., to uphold universal standards of sound ethical behaviour.

SiyaqUber is committed to living by the following values:

- **Honesty and integrity**  
We tell the truth and act consistently on a set of ethical principles.
- **Professionalism and diligence**  
We strive to perform at the highest level of excellence.
- **Mutual respect and fairness**  
We acknowledge the rights and dignity of others and treat those we engage with equitably.

All SiyaqUber approved driver partners are advised that the rules set out in this policy are the minimum standards of acceptable conduct expected from them and all other stakeholders who engage with SiyaqUber.

#### 2. Duties and Responsibilities of SiyaqUber approved driver partners under the Code

##### 2.1 General duties and responsibilities

SiyaqUber approved driver partners have an express duty under the Code to:

- Conform to the highest standards of honesty, integrity and impartiality;
- Ensure that all their actions are consistent with the main business of SiyaqUber, namely, the “BEE validation service to Uber through providing empowerment driven opportunities within the Uber for Business platform;”
- Act in an honest and ethical manner; and
- Not engage in any conduct that may in any way denigrate or harm the public image of Uber or SiyaqUber.

Each and every SiyaqUber approved driver partner has the obligation to not only abide by the Code, but also to report violations of the Code when they become aware of them. And also required to not promote their own interests at the expense of the interests or integrity of SiyaqUber or of the Uber platform in general.

##### 2.2 Conflict of interest

- SiyaqUber approved driver partners are required to be free from any influence which might interfere or seem to interfere with the proper and efficient discharge of their duties or which might impact or seem to impact on their duty of loyalty to SiyaqUber.
- Where a SiyaqUber approved driver partner, either directly or indirectly has a conflict or there is a potential for a conflict to arise, then he/she must:
  - (a) disclose the interest to SiyaqUber;
  - (b) excuse him/herself from any formal discussions related to the conflict of interest; and
  - (c) abstain from voting and from seeking to influence the vote on any matter related to the conflict of interest.

##### 2.3 Integrity (bribery, gifts and hospitality)

- SiyaqUber approved driver partners must neither accept nor offer any bribe, payment, gift, hospitality or other questionable inducement that is intended or may reasonably be construed as being intended to influence the SiyaqUber approved driver partner to make decisions other than in the best interests of SiyaqUber. In such case, a person must immediately disclose such offer or any request for inducement to SiyaqUber without delay.



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## 2.4 Confidentiality

- SiyaqUber approved driver partners may not disclose any facts, data or other information entrusted to them in confidence or gained by virtue of their work as a SiyaqUber approved driver partner. This duty shall continue indefinitely or until such time as the relevant information comes into the public domain or is required to be disclosed by law or permission to divulge same has been granted by a duly authorised official of SiyaqUber.

## 3. Investigations of alleged breaches under the Code

Any allegation or suspicion of a breach of the Code by any SiyaqUber approved driver partner, whatever the source, shall be referred to an Executive of SiyaqUber whom shall conduct an investigation into the activities of any SiyaqUber approved driver partner that he or she believes may have committed an offence under the Code.

As part of any investigation, if the Executive reasonably suspects that a SiyaqUber approved driver partner has committed an offence under the Code, the SiyaqUber approved driver partner shall be sent a written “Notice of Allegations of Breach” which may be accompanied by any statement or submissions relating to this alleged breach.

## 4. Responding to a Notice of Allegations of Breach

The SiyaqUber approved driver partner shall be required to respond to the Notice of Allegations of Breach and/or any statement or submissions filled, within 15 days of receipt of the notice. The Executive shall be provided with an opportunity to reply to the SiyaqUber driver partner’s response, within 15 days of receipt of same. The Executive will thereafter determine, in his or her sole discretion, whether any further submissions are necessary or desirable.

## 5. Sanctions

Where the SiyaqUber approved driver is in breach of the Code, the SiyaqUber Board shall consider what sanctions are appropriate in the circumstances, considering factors such as the nature of the relevant offence under the Code, and other aggravating and mitigating factors as it or he/she deems relevant and appropriate. Such sanctions may include a termination of membership privileges and a suspension from the SiyaqUber program for a particular period.

It shall be a condition of membership of the SiyaqUber program that all SiyaqUber approved driver partners shall comply with, recognise and take all necessary and reasonable steps within their power to enforce and give effect to the Code and to all decisions taken and sanctions imposed thereunder.

## 6. No Appeal

The decision of the SiyaqUber Board as to sanctions, shall be final and binding and there shall be no right of appeal.

## 7. Policy Update and Notification

SiyaqUber reserves the right to revise the conditions of this policy at any time. All SiyaqUber approved driver partners are responsible for understanding or seeking clarification of any rules outlined in this document and to familiarize themselves with the most current version of this policy.

The headings used for the various sections of the Code, are for the purpose of guidance only and shall not be deemed to be part of the substance of the Code or to inform or affect in any way the language of the provisions to which they refer. If any heading or provision of this Code is held invalid, unenforceable or illegal for any reason, it shall be deemed deleted, and the Code shall remain otherwise in full force and effect.

The Code is governed by and shall be construed in accordance with South African law. Disputes relating to the Code shall be subject to the exclusive jurisdiction of the courts in South Africa.

**For and on behalf of the SiyaqUber approved driver partner:**

Full name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

**For and on behalf of SiyaqUber, its affiliates and/or subsidiaries:**

Full name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_