

Corporate Governance Policy of TrillCom (Pty) LTD

“ Our Credo”

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Foreword

We will change the world and make it a better place for everyone using communications. We will bring out the best in each other and foster growth and continual improvement of ourselves and our colleagues. We will always act with integrity and create an environment where people can flourish as individuals and as a team. We will make a difference in the lives of all of those that we touch.

We shall align ourselves with world-class partners in order to make the best of breed technology, products and services available to those we serve. We shall do this responsibly and sustainably and work ethically and live by our values. Our business standards and our people policies will always be grounded in these principles.

Acting with integrity and working ethically makes good business sense and will help us to work together across the world. Behaving ethically should be part of everything that we do.

Each time we act with integrity and stick to our business principles we strengthen our reputation. Sometimes we may need to reject potential business if it would force us to compromise our principles. We treat this company as our own and ask when we are confused or not certain of what to do. We believe that our personal actions make the difference in this company because we are TrillCom.

Business Principles

Business principles are adopted in order to guide the way we conduct business in TrillCom. If we do not follow these principles it could lead to serious consequences, including damage to our reputation, incurring significant fines and penalties, and even criminal liability for you, your manager(s) and/or TrillCom. If you work for TrillCom and you don't comply with our business principles, we will investigate fully and may take appropriate disciplinary action, up to and including dismissal.

Acting with integrity

This means keeping to our business principles and standards. Integrity matters and also makes good business sense for TrillCom. It gives people confidence in our business, which helps us to keep growing and make a healthy return for our shareholders over the long term.

Acting with integrity helps us to work together. It also helps us make our planning and implementation more efficient, effective, pre-empt problems and build stronger relationships with all our stakeholders.

Working ethically

Everyone in TrillCom lives up to the same high standards. As a company we always want to do the right thing – but that's not always straightforward. Sometimes we have to make difficult decisions, balancing complex and conflicting issues and interests. We believe in being transparent, open and honest in all the ways we report our performance: financially, environmentally and socially. We must take the responsibility and be ready to justify our actions and explain ourselves to the people our decisions affect.

Living our values

Our value system is at the heart of what we do at TrillCom. It sums what we all have in common, and spell out the behaviours we expect from each other. All of us must consider the values alongside the business principles and constantly ask ourselves if what we are doing is in line with our values and business principles.

Business Standards

Personal and business integrity

We follow the law, our licensing/ authorisation obligations and any other regulations.

Following the law is the foundation on which our ethical standards are built. We are honest and respectful. We always respect and obey the laws, rules and regulations of the cities, states, and countries we operate in. There might also be laws that apply internationally (e.g. the 2010 UK Bribery Act or the US Foreign and Corrupt Practices Act) or licence requirements that apply. As a global company, TrillCom needs to be careful about where it trades and who it trades with. This includes complying with embargoes and sanctions which have been imposed on certain countries or groups of countries, or individuals.

We are legally required to comply with sanctions and embargoes across the world. Failing to comply with these sanctions or embargoes may expose TrillCom and you personally to severe criminal and administrative penalties, as well as reputational damage to the TrillCom brand.

Although you're not expected to know the detail of every law, rule and regulation, you are expected to know enough so that you can judge when to seek advice.

If you work for TrillCom and you think you, a colleague, or someone else connected to TrillCom may have broken the law, report it to your line manager.

Bribery and corruption

At TrillCom we have zero tolerance of bribery. If you make, authorise, seek or accept any kind of offer, gift, kickback or payment to get or keep an unfair advantage, that's bribery. It doesn't have to involve money.

The RSA, UK, the US and many other countries have laws against bribery in both the public and private sectors. Laws such as the 2010 UK Bribery Act and the US Foreign Corrupt Practices Act have worldwide scope and apply to TrillCom wherever we do business.

Corruption can take many forms and we can't list them all. But watch out for:

- abnormal cash payments
- lavish gifts being received
- unexpected or illogical decisions accepting projects or contracts
- the unusually smooth process of cases where someone does not have the expected level of knowledge or expertise
- bypassing normal tendering or contracting procedures
- Company procedures, financial controls or guidelines not being followed. If you break anti-corruption laws, you could bring criminal or civil penalties on yourself, TrillCom or our partners.

Giving and receiving gifts and hospitality

We never offer or accept gifts, payments or hospitality to encourage or reward a decision. Gifts and hospitality can be a normal and healthy part of building business relationships. They're only a



problem if they're meant to influence our decision-making, give us an unfair advantage over our competitors, or limit our customer's right to choose freely. Different cultures have different attitudes about what is or isn't acceptable.

Every time you give or receive a gift or hospitality of any kind, you must follow the policy. You must not give or receive a gift or hospitality if it is intended to influence you or the person receiving it and you must not give or receive lavish or extravagant gifts and hospitality which is, or may be seen to be, inappropriate in the circumstances.

Conflicts of interest

A conflict of interest is any situation where your loyalties might appear to be at odds with your duties to TrillCom.

It could be a conflict between TrillCom's interests and your own personal interest. If a personal interest interferes, or even appears to interfere, with your duties to TrillCom then a conflict of interest may arise. Conflicts of interest may also be financial, such as a significant shareholding in a competitor of TrillCom or working for a competitor or supplier of TrillCom or having another job which causes your TrillCom work to suffer; or non-financial, such as a conflict arising out of close family and/or other personal relationships.

We expect everyone who works for TrillCom to be unbiased and upfront, whatever part or level of our organisation you work in. You must not use your position at TrillCom (or any inside information) for your personal gain, or in a way that could damage our business – or even give people reason to believe that you might.

If you work for TrillCom and think someone else in the company might have a conflict of interest, tell them or their line manager. If you think someone working for a TrillCom supplier or a TrillCom agent might have a conflict of interest with TrillCom, tell your line manager

Protecting information and assets

Information and Data

We frequently need to use information about people to do our job – whether it's about our own colleagues, our residential customers or people data belonging to our business customers. You should always treat such data like it was your own – keep it safe and secure and think about how you would want things to be done if your own information were involved.

Privacy and data compliance

Information about people is also known as personal data – this can be, for example, someone's name, address, telephone number, personal email address, and account number, date of birth, bank account or billing information. It includes data held on TrillCom's systems, in paper documents, emails, call recordings, USB sticks, mobile devices or other storage media. Handling personal data properly is key to building trust with both our customers and colleagues.

Personal data is seen as so important that many countries have privacy laws covering how it should be handled and protected and we must comply with these. So, make sure you can recognise what is,



and what isn't, personal data; understand how you are expected to use this information in your day-to-day job and be alert to what can go wrong.

TrillCom also handles large amounts of information given to us by businesses and public sector organisations who are our customers. Some of this information will be "personal data" described above. Some of it may not be people data but will still be very important to our business and public sector customers. So, these big customers will often tell us specifically how they want us to use and protect their data.

Key points for everyone to remember when working with personal data:

- You should only collect and retain personal data for legitimate business purposes or where the law requires us to do so
 - Only collect and use as much personal data as you need for the task in hand and your job role, and no more
 - Be prepared to challenge colleagues when they ask for access to personal data – do they have the authority and a genuine business need for it?
- Where you have access to personal data it should only be used for the purposes for which it was collected
 - Don't use personal data for new or different purposes, e.g. systems testing, unless you get approval from TrillCom's Attorney.
 - Never discuss or disclose data to colleagues unless there is a business need to do so.
- Make sure all personal data we hold is accurate and kept up to date
 - Take the time to make sure you capture person's personal details correctly, e.g. when taking an order – Mistakes can be costly and make us look unprofessional
 - Always take the opportunity to check customer contact and billing details
 - If someone says they don't want to receive direct marketing from TrillCom make sure you update their details immediately on the TrillCom system.
- Keep personal data safe and secure to make sure that no one can get unauthorised access to it, change, destroy or lose it
 - Always check that someone claiming to be a customer or a colleague from elsewhere in TrillCom is who they say they are
 - Always consider what is in the data and documents you are working with and classify them properly; only share as much as you need to achieve your goal
 - Remember to think carefully about where you are, and who might overhear or see what you're working on. Don't discuss confidential TrillCom business in public places
 - Before sending information outside the company, ask yourself: "Is it appropriate to send?" and "Have I protected it?"
 - Lock paper documents away and make use of shredders or confidential waste bins when you want to dispose of them.
- Only hold personal data as long as it's required for the original purpose for which we obtained the data, unless required by law. TrillCom has set time limits for how long to keep data
 - Always ask yourself, "Do I really need to keep this data?"
 - Never store personal data on laptops, memory sticks or other storage devices for longer than is required

- Undertake regular housekeeping and delete/ destroy/shred data that is no longer required.

Managing Our Assets

Each of us is personally responsible for protecting TrillCom's assets – whether it's our equipment, property and information or knowledge and ideas. That includes keeping proper records of any resources we use and following our security policies.

Theft, carelessness, waste, damaging or misusing property and deliberately changing records have a direct impact on TrillCom's profitability. We must not misuse the intranet or the internet. All TrillCom's assets must be used for legitimate TrillCom purposes. TrillCom may access and monitor computer files and electronic communications stored on our company servers, computers and other electronic devices. We do this for maintenance, business purposes or to meet our legal obligations. And we do it in line with our privacy and data protection policies and the law. We don't act fraudulently, deceive people or make false claims.

Managing Risks

The way a business manages its risks is critical to its success. Effective risk management creates stability, contributes to profit, protects our reputation and also enables TrillCom to take advantage of opportunities. We manage our risks in line with our appetite for risk, and what we believe to be TrillCom's best commercial interests. Our people must think about risks in their day-to-day jobs. Think about the risks and implications of your actions and advice. Be accountable for them and the impact they have on colleagues, communities and the business.

The important thing is to take sensible risks and manage those risks in the right way. We have to manage all risks carefully as our appetite for risk, the law and our commercial position change over time. We need to be free to take calculated risks. The idea is to take rewarding risks, not avoid all risk.