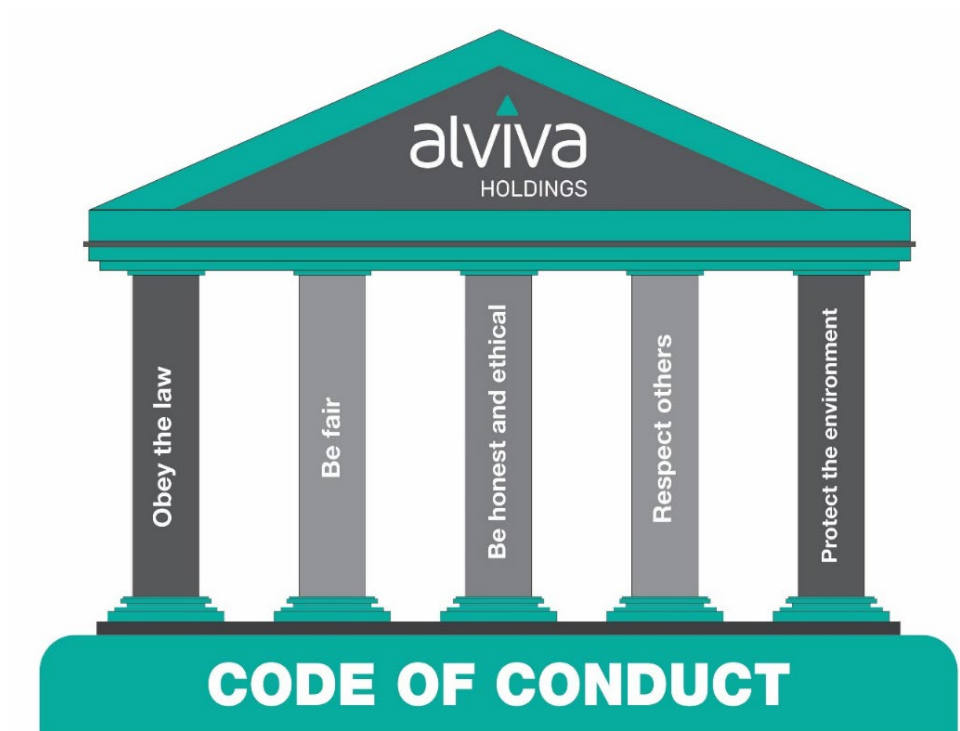


Code of Conduct



PROCESS OWNER	: A Gerber
APPROVED BY	: Alviva Social and Ethics Committee
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This document has been prepared for the use of all management and staff of the Fonzosys group of companies (Alviva) and must be shared in its current format, branding and unique document referencing.

This document contains 22 pages.

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Document Control

Version	Author	Comment / Summary of updates	Approved by	Approval date	Next revision date
01	A Gerber	Audit Committee	Newly drafted document.	10-06-2010	14-06-2012
02	A Gerber	Audit and Risk Committee	Updated to include more guidance on anti-corruption, use of social media and the gifts policy. Updated with new logo.	30-08-2013	30-08-2014
03	R Nkuna	Audit and Risk Committee	Removed all reference to Alviva Holdings. Added specific principles covering protection of information and anti-bribery compliance.	14-10-2016	14-10-2017
04	A Gerber	Not applicable	Replaced all reference of Pinnacle with Alviva. Rebranded with Alviva corporate identity.	14-10-2016	14-10-2017
05	A Gerber	Alviva Board	Alignment with King IV provisions. Alignment with specific vendor requirements.	06-09-2018	06-09-2019
06	V Parkin	Alviva Board	Updated Vision and Mission.	22-09-2020	22-08-2021
07	V Parkin	P Spies	Annual review.	13-09-2024	13-09-2025
08	A Gerber	Social and Ethics Committee	Cyclical review, alignment with King V and incorporated ethical use of Artificial Intelligence and specific vendor requirements.	16-02-2026	16-02-2027

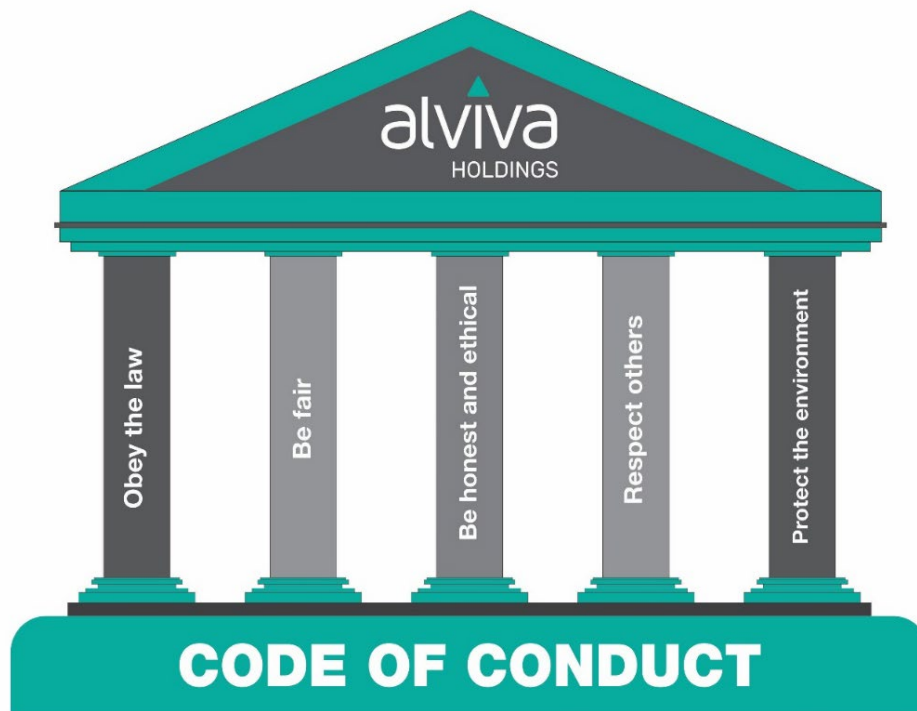


Glossary

Abbreviation / Terminology	Definition
AI	Artificial Intelligence. It refers to simulation of human intelligence by machines, especially computer systems, to perform tasks that typically require human cognitive abilities such as learning, reasoning, making decisions or solving problems based on available data, perception, interpreting information, language understanding, processing and generating human language and autonomous action
Alviva	Fonzosys (Pty) Ltd, Alviva (Pty) Ltd, and Alviva Shared Management Services (Pty) Ltd, together with all wholly-owned or partially-owned subsidiaries, associated entities, divisions, business units, branches, and departments operating under these legal entities.
B-BBEE	Broad Based Black Economic Empowerment.
Code	Code of Conduct.
Employee	Any individual who renders services on behalf of Alviva. This definition includes, at a minimum full-time and part-time employees, fixed-term contractors, service providers to Alviva's stakeholders, third-party personnel and directors. Obligations may be governed by an employment or services contract (written, verbal, or implied) in exchange for compensation, which may include wages, salary, or invoicing to Alviva.
FCPA	The Foreign Corrupt Practices Act (FCPA) is a federal United States law aimed at preventing the bribery of foreign government officials to obtain or retain business. It is applicable globally to everyone who deal with American institutions.
Organisation	The Group or Company including Fonzosys (Pty) Ltd, Alviva Holdings (Pty) Ltd, Alviva Shared Management Services (Pty) Ltd and subsidiaries, departments and other operating entities forming part of the Alviva Group.
ICT	Information and Communication Technology
King V™	Report on Corporate Governance for South Africa 2025.
PoPIA	Protection of Personal Information Act, No 4 of 2013.
We	Alviva, Fonzosys, Company, Group, Organisation.



Alviva Code of Conduct summarised



Alviva Code of Conduct	 Obey the law	- Follow the laws and rules of the countries we operate in - Never break the law to get results - Say no to bribery, fraud, or corruption - If something feels illegal or wrong – don't do it and speak up	
	 Be fair	- Treat suppliers, customers and colleagues fairly - Never offer or accept bribes or kickbacks - Don't accept expensive gifts or favours - Avoid conflicts of interest - Make decisions that are honest and independent	
	 Be honest and ethical	- Be honest in everything you do - Share information that is accurate and complete - Protect company information and assets - Respect confidential information and intellectual property	
	 Respect Others	- We do not tolerate discrimination or harassment - Treat everyone with respect and professionalism - Help create a safe and healthy workplace - Follow safety rules and look out for one another	
	 Protect the Environment	- Use resources responsibly - Reduce waste where possible - Follow environmental and waste-handling rules - Support sustainable ways of working	



1. Purpose of this document

This Code of Conduct is a set of guidelines that define acceptable behaviour in Alviva. It explains the Alviva Code of Conduct (“the Code”) and details the conduct expected of all employees and other representatives of the organisation. The Code gives guidance on acceptable and responsible behaviour clearly to all within the organisation. It serves as a formal statement of the organisation’s ethical principles to external stakeholders and outlines the standards and expectations for conducting business with any of the organisation’s companies.

The purpose of this Code is to align both employee and director conduct to achieve the four governance outcomes as recommended by the King V™ report on Corporate Governance. The four governance outcomes are:

- Ethical culture;
- Performance and value creation;
- Adequate and effective control; and
- Trust, good reputation, and legitimacy.

2. Scope of this document

This Code of Conduct is applicable to all employees and directors of Alviva. It also applies to all fixed term and temporary contractors or any other parties who perform services on behalf of or represent Alviva.

All business units and subsidiaries must adopt this policy in its entirety without amendment. While it is acknowledged that this policy may not fully address every group-wide requirement, no changes to the core content of this policy are permitted.

If a business unit wishes to include additional requirements or information specific to its operations, such as subsidiary-specific values or vendor-related requirements, these may be incorporated as an addendum to this policy.

3. Ethics policy statement

At Alviva, we pride ourselves that we are an ethical company. We acknowledge and applaud everyone who upholds our ethical values. Conversely, we take any breaches of our ethical values seriously through decisive action.

Alviva mandates each of its business units, subsidiaries, all employees, directors, contractors or anyone who performs work on behalf of Alviva, to carry out their business and perform their duties:

- to the highest ethical standards; and
- in compliance with all relevant legal, contractual and other requirements.

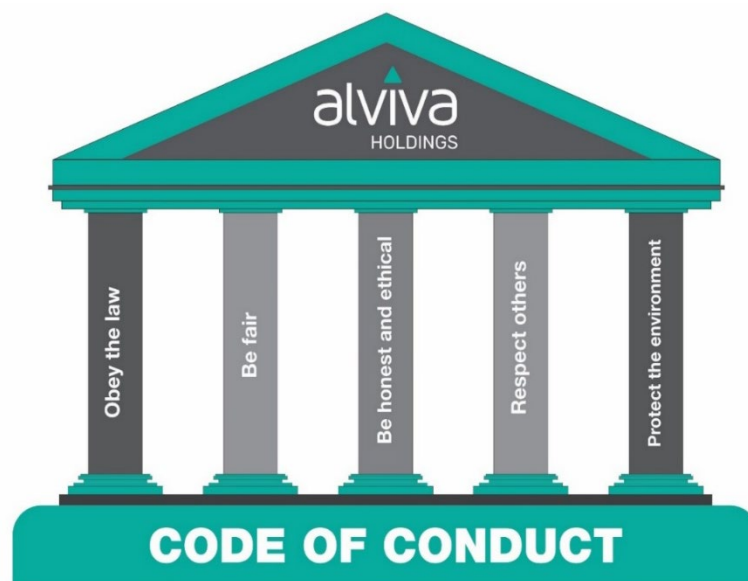
This standard of behaviour and performance is maintained in the company’s dealings with employees, customers, suppliers, the community, and all other stakeholders.



The company, its employees and contractors always demonstrate, the highest levels of integrity, truthfulness, and honesty to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The organisation conducts its business in a competent, fair, impartial, and efficient manner.

The Code of Conduct mandates all employees and representatives of the company to:

1. Obey the law;
2. Be fair;
3. Be honest and ethical;
4. Respect others; and
5. Protect the environment.



More specifically:

- Alviva seeks to build long term partnerships with its stakeholders including but not limited to its customers, clients, suppliers and employees, by always being honest and straightforward in its dealings.
- Honesty and openness are key in Alviva's dealings with its stakeholders including but not limited to its customers, clients, suppliers and employees.
- Alviva is committed to providing a safe and healthy working environment for all stakeholders.
- Alviva does not allow the direct or indirect offering, payment, solicitation, or acceptance of bribes in any form.
- Alviva respects the environment and the need to protect it. We strive to minimise the impact our operations have on it.
- All employees are treated with dignity and respect, with equal employment opportunities.
- Alviva complies with international, national, and local legislation.



4. Authority and responsibility

As part of our commitment to honest, ethical, and legal conduct, compliance with the Code by all employees and other representatives of the organisation is mandatory. The Code is not intended to address every specific situation, but documents general principles to adhere to when interacting with other employees or third parties, taking decisions and acting on behalf of the organisation.

Employees are strongly encouraged to engage in dialogue between themselves and their su-



pervisors to make everyone aware of situations that may give rise to ethical questions and to articulate acceptable ways of handling those situations. Any employee who has questions about the Code at any time, is strongly urged to contact their Human Resource Manager, Compliance Officer or designate or any director or member of the senior management team.

All employees and directors must read and become familiar with the Code. They are expected to fully comply with the Code, including updates of the Code which may take place from time to time.

All new employees are required to sign and agree to abide by this Code as a condition of their employment. Employees may be required to acknowledge compliance with the Code as and when requested to do so. The responsibility for oversight of the Code is shared by the Compliance and Human Resources departments.

5. Contravention of this Code and reporting

5.1 Contravention

Alviva regards any contravention of the Code as a serious matter. Contravention may result in disciplinary action, including the termination of employment. Certain breaches of the Code could also result in civil or criminal proceedings.

It is Alviva's policy that criminal action pertaining to all defalcations is considered, irrespective of the value. In South Africa, under the Prevention and Combating of Corrupt Activities Act (PRECCA) No. 12 of 2004, specifically Section 34, any person in a position of authority who becomes aware of corruption or fraud is legally required to report such acts if the value involved exceeds ZAR100,000. This requirement is particularly relevant in South Africa. Similar obligations in other jurisdictions where Alviva operates must also be observed.

Failure to Follow Policies

Risk of Job Termination

5.2 Reporting suspected non-compliance

Employees, contractors, and third parties must promptly report any suspected or actual breach of this Code. Reports can be made through the Company's designated Ethics Whistle-blower Hotline, subsidiary Compliance Officers or designate, subsidiary senior management, Alviva Compliance department or other approved reporting channels. If employees believe



that their own actions have, or may have, contravened the Code, they should report such incidents. Furthermore, if employees suspect that another employee of the Group has committed a contravention of the Code, they should promptly and confidentially report this.

The organisation must ensure that all reported concerns are investigated promptly, fairly, and confidentially by the appropriate function. Investigations will follow established procedures to determine facts, assess risks, and recommend corrective actions.

5.3 Confidentiality

Reports made using the Alviva Ethics Line (Whistle-blower Hotline) are completely confidential (unless the employee making the report states otherwise). For reports made in other ways, the organisation will not disclose, to the extent possible, the identity of anyone who reports a suspected violation or who participates in an investigation. Employees should be aware that those participating in investigations are obligated to act in the best interests of Alviva and do not act as personal representatives or lawyers for employees.

5.4 Protection of whistle-blowers

Employees who report suspected violations, even if by management, will not be victimised and can do so without fear of reprisal. Valid reports can be presented without retaliation or intimidation. Alviva strictly prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation. Whistleblowers are protected under Alviva's Ethics and Compliance Framework. Any act of retaliation will result in disciplinary action, up to and including termination of service.

6. Alviva vision and mission

6.1 Our vision

Our people are our biggest asset and, with the drive for constant improvement and a service-driven culture, we are building a company for generations to come.

6.2 Our mission

Alviva's mission is to maximise the returns of all its stakeholders through the execution of its vision, which will be achieved by focusing on:

- being an equal opportunity company and developing staff to their full potential through the implementation of training and development programmes;
- continuous innovation and improvement in supply-chain management, services and solutions;
- growth opportunities;
- continued expansion of product and service offerings to promote growth, penetrate new sectors and contribute to the development of infrastructure;
- expansion of its geographical footprint into markets which offer growth opportunities;
- delivering above average returns to all stakeholders;



- proactive participation in B-BBEE, climate risk and sustainability; and
- subscribing to the principles of sustainable development through identification, management and measurement of integrated economic, social, environmental and business performance.

To achieve the vision the following is need:

- Continuous innovation and improvement in supply chain management;
- Recognising our suppliers as stakeholders and nurturing long term relationships;
- Being an equal opportunity company and develop staff to their full potential;
- Delivering exceptional returns for all stakeholders; and
- Adopting environmental standards and practices to minimise our impact on non-renewable resources and supporting sustainability initiatives.

6.3 Our values

Alviva's core values are summarised below:



Alviva values apply to all employees. It is acknowledged that individual operating entities in the organisation also have their own additional set of values. The onus is on the employee to familiarise themselves with the values specific to their own area of work.

7. Compliance with laws, regulations, contracts and procedures

Employees must comply with all applicable laws, regulations, contracts, and procedures which relate to their activities for and on behalf of the Group. The onus is on the employees to familiarise themselves with all laws that might be applicable to their area of work and the specific function performed by them. This includes not only laws in South Africa but also all foreign countries in which the Group conducts business. Adherence to the following laws is required but is not restricted to all laws relating to employment, licensing, distributing, anti-trust, tax, equal opportunity, fair labour, securities, banking, currency, environmental, health and safety and USA-based Foreign Corrupt Practices Act and export compliance legislation.



The Group will not condone any violation of the law or unethical business dealing by any employee, including any payment for, or other participation in, an illegal act. Bribes, undercover payments, kickbacks (whether in the form of money or gifts) and the like, whether made directly or indirectly through consultants or other means, are not permitted under any circumstances.



Although compliance with all laws is mandatory, the following areas require more specific attention:

7.1 Policies, procedures and contracts

All employees must adhere to official Group policies, procedures, employment contracts as well as reasonable instructions from superiors. Employees are responsible to familiarise themselves with all the Group's policies, procedures and contracts that are applicable to them.

7.2 Antitrust laws

The South African government and most of the territories in which our clients and suppliers reside have enacted antitrust or "competition" laws. These laws prohibit "restraints of trade" which is certain conduct involving competitors, customers, or suppliers in the marketplace. This conduct includes activities such as making agreements with competitors on pricing or markets, or making agreements with customers on retail price levels of the Group's products; and

7.3 Anti-corruption and bribery laws

It is illegal to bribe anyone to solicit a sale, especially government and public officials. Anti-corruption laws include the American based Foreign Corruption Practices Act, UK Anti-bribery Act and the South African Prevention and Combating of Corrupt Activities Act. Employees must familiarise themselves with anti-corruption legislation and vendor-specific requirements relating to corruption and similarly inform customers and third parties as to the requirements. Employees must be aware of red flags covering fraud and corruption and escalate any suspicious activity or information to their manager.

Employee must familiarise themselves with the provisions of the Alviva Gifts and Benefits Policy as it relates to bribery and corruption. The company will provide the necessary guidance and training on company policy as it relates to gifts and benefits. Employees should address any queries to their management, Human Resources, or Compliance department, where relevant.



7.4 Money laundering and anti-terrorist financing

Alviva is committed to preventing its operations, employees, and business partners from being used for money laundering or terrorist financing activities. These practices are illegal and undermine the integrity of financial systems globally. All employees must comply with applicable anti-money laundering (AML) and counter-terrorist financing (CTF) laws and regulations in every jurisdiction where Alviva operates. Proper identification, verification, and due diligence processes for customers, clients and employees must be followed. Any suspicious transactions or activities that may indicate money laundering or terrorist financing must be reported immediately. The onus is on each employee to undergo relevant training to ensure they understand their responsibilities and can identify red flags.

7.5 Data privacy

Alviva and its employees are committed to protecting the privacy and confidentiality of personal and sensitive information entrusted to us by employees, customers, suppliers, and other stakeholders. All employees must comply with applicable data protection and privacy laws, including the General Data Protection Regulation (GDPR), the Protection of Personal Information Act (POPIA), and other relevant legislation in jurisdictions where Alviva operates. Personal data must be collected, processed, stored, and shared only for legitimate business purposes and in accordance with legal requirements. Employees must ensure that personal and confidential information is accessed only by authorized individuals and protected against unauthorized disclosure, alteration, or destruction. Individuals have the right to know how their data is used.

7.6 Information Technology

Alviva is committed to maintaining the integrity, confidentiality, and availability of its information systems. Employees play a critical role in safeguarding technology resources and data. All employees must adhere to Alviva's IT Security Policy, Acceptable Use Policy, and related standards and policies. Employees must use only authorized systems and accounts, may never share passwords or access credentials. They must report any unauthorized access immediately in line with guidance under 5.2 above. Employees must be vigilant against phishing, malware, and other cyber threats. They must complete cybersecurity training and follow best practices. Employees may not disable security controls, bypass firewalls, or engage in activities that compromise system integrity.

7.7 Modern slavery and human rights

Alviva is committed to upholding the highest standards of human rights and ensuring that modern slavery, forced labour, and human trafficking have no place in our operations or supply chains.

8. Conflicts of interest

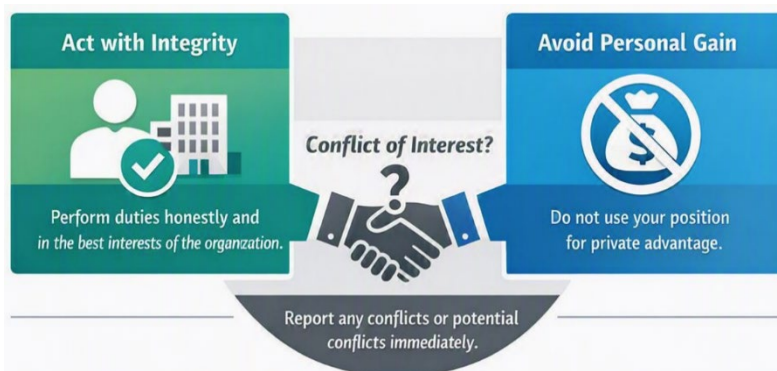
Employees are expected to perform their duties conscientiously, honestly and in accordance with the best interests of the organisation.



Employees must not use their positions or know-ledge gained through their employment with the organisation, for private or personal advantage, or in such a manner that a conflict or an appearance of conflict arises between the organisation's interest and their personal interests. A conflict could arise where an employee, a member of an employee's family, or a business with which the employee or family is associated obtains a gain, advantage, or profit by virtue of the employee's position with the organisation or knowledge gained through that position.

If employees feel that a course of action which they have pursued, are pursuing or are contemplating pursuing, may involve them in a conflict-of-interest situation or a perceived conflict of interest situation, they should immediately make all the facts known to the person to whom they report.

No employees may solicit, accept, offer, or give any bribes as defined by the Alviva Gifts and Benefits Policy. This policy is available to all employees for further information and adoption. Specific care must be taken when engaging with political and charitable organisations as it refers to gifts and benefits. The provisions of the Alviva Gifts and Benefits Policy must be specifically adhered to as it relates to political and charitable organisations. Refer to the Alviva Gifts and Benefits Policy on how these types of benefits could be deemed as 'questionable' or even 'unacceptable'.



8.1 Outside activities, employment and directorships

Employees should avoid acquiring any business interest or participating in any activity outside the organisation which would create, or appear to create:

- an excessive demand upon their time, attention and energy which would deprive the organisation of their best efforts on the job; or
- a conflict of interest - that is, an obligation, interest or distraction which would interfere or appear to interfere with the independent exercise of judgement in the organisation's best interest.



Employees may not take up outside employment or revenue generating activities without the prior approval of the manager of the respective operating unit or function where they are employed.

Employees who hold, or have been invite d to hold, outside directorships should take particular care to ensure compliance with all provisions of this Code. When outside business directorships are being considered, prior approval must be obtained from the subsidiary Executive team.



8.2 Relationships with clients, customers, and suppliers



Employees must ensure that they are independent, and are seen to be independent, from any business organisation having a contractual relationship with the Group or providing goods or services to the organisation, if such a relationship might influence or create the impression of influencing their decisions in the performance of their duties on behalf of the organisation. In such circumstances, employees should not invest in, nor acquire a financial interest, directly or indirectly, in such an organisation.

8.3 Gifts and benefits to government officials

Various integrity frameworks in government exist, which give guidance on the receiving of gifts and benefits by government and public officials. The organisation generally subscribes to frameworks of all governments in all territories in which it operates as well as any anti-corruption legislation, including the FCPA. Some government departments strictly prohibit gifts or benefits, irrespective of the value.

The onus is on the employee to familiarise themselves with the provisions of the Alviva Gifts and Benefits Policy as it relates to guidance on how they should interact with public officials. The Company expressly prohibits facilitation payments.



9. Business practices

Adherence to the Alviva Gifts and Benefits Policy is mandatory. Violation of this policy is a serious offence. Refer Contravention of the Code (**Error! Reference source not found.**). Employees must familiarise themselves with the requirements of this policy and associated Gifts and Benefits register. All gifts, hospitality and favours accepted, offered or given must comply with the Alviva Gifts and Benefits Policy.

9.1 Giving or offering of gifts, hospitality, and favours

The offering and giving of gifts and benefits could put the organisation's name in disrepute if deemed unreasonable or out of the norm. Employees are in violation of this Code if they offer,



give or receive gifts, benefits or bribes which negatively impact Alviva's reputation in any way and which are in violation of Alviva Gifts and Benefits Policy.

Employees may not influence anyone with any personal payments, rewards, or benefits. All employees are obligated to adhere to anti-bribery legislation including the Foreign Corrupt Practices Act (US 1977), the Prevention and Combatting of Corrupt Activities Act (act 12 of 2004),

and vendor contractual obligations. Gifts, hospitality, and entertainment may only be offered to a business-related party if they are consistent with customary business practice, modest in value, transparent, not in contravention of any applicable law and public disclosure thereof would not embarrass the Group. Where certain government departments allow gifts from suppliers, special care must be taken when benefits are extended to government officials.



9.2 Receiving of gifts, hospitality and favours

An employee or any representative of Alviva may not accept gifts, hospitality, or other favours from customers, suppliers or any other stakeholders that can unduly influence judgment. However, acceptance of the following would not be considered contrary to such policy in the following instances:

- advertising matter of limited commercial value;
- occasional business entertaining such as lunches, cocktail parties, or dinners; and
- occasional personal hospitality such as tickets to local sporting events or theatres.

In addition, no personal favours or other preferential treatment should be accepted by any employee when they are offered because of the employee's position within the organisation and, therefore, might tend to place the recipient under obligation. Unsolicited gifts which do not fall within acceptable limits should be returned, applied to the benefit of Alviva or specific department.



9.3 Remuneration

The organisation remunerates employees based upon formal remuneration scales and rates for salaries, wages, fringe benefits, and other regular remuneration. No employee may receive commissions or other remuneration related to the sale of any product of the organisation, except as specifically provided under the individual's terms of employment.

Employees may not receive any money or thing of value (other than the Group's regular remuneration or other incentives), either directly or indirectly, for negotiating, procuring, recommending, or aiding in any transaction made by or on behalf of the Group, nor have any direct or indirect financial interest in such a transaction.

Employees are remunerated based on the performance of all responsibilities associated with their specific job function and not only on specific value drivers such as the meeting of sales targets. Over and above relevant disciplinary action, violation of the Code could result in performance remuneration being suspended.

9.4 Accuracy of business records, documents and reporting

Alviva follows generally accepted accounting principles and maintains appropriate controls to ensure accurate and timely recording of accounting transactions and the accuracy of financial records and reports. Alviva has adopted controls in accordance with internal needs and the requirements of applicable laws and regulations. These established accounting practices and procedures must be followed to assure the complete and accurate financial recording and reporting. All employees, within their areas of responsibility, are expected to adhere to these requirements.



Employees involved in import and export transactions must ensure that all required documents are accurately completed and maintained, and that all import/export transactions are conducted in compliance with applicable laws and regulations.



No employee or Director may interfere with or seek to improperly influence, directly or indirectly, the auditing of the organisation's financial records. If any employee becomes aware of any improper transaction or accounting practice involving the organisation, he or she should report the matter immediately as guided mandated by 4 above.

All employees are required to engage in open and honest communication and to accurately report all information presented to enable informed decision making and protect shareholder and Alviva interests.

10. Use of Company funds and assets

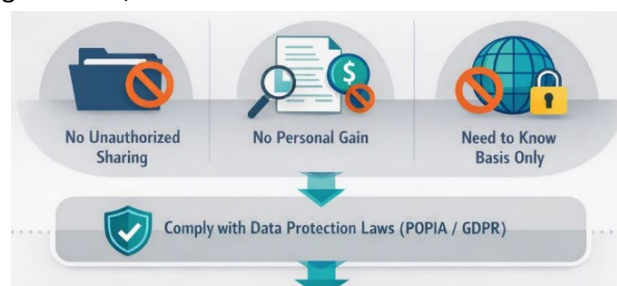
Employees should use Alviva funds and other assets only for lawful, proper, and authorized purposes. All organisational funds are to be held only in Alviva's name. Transactions with respect to funds and any other Group assets or liabilities must be recorded in the books and records of the organisation, and all entries must reflect accurately the transaction giving rise to such entries.

Employees are expected not to misuse the expense reimbursement system. Payments by or to the organisation are to be made or received solely for the purpose described in the document supporting such payments.

Employees and Directors must protect Alviva's assets and ensure their efficient use. Theft, carelessness, and waste impact our profitability.

11. Company records and security of information

Employees may not unlawfully obtain, make copies of, distribute, or discuss company-specific information with anyone in or outside of the organisation, who should not have access to such information. Employees shall share confidential information within the Group on a "need to know" basis only. An employee may not use confidential information, personal information or any other Company, customer of supplier information for personal gain. Employees must remain compliant with the requirements of the South African Protection of Personal Information Act No4 of 2013 (PoPI), or similar legislation in the various territories of operation (e.g. the European Union's General Data Protection Regulation GDPR).



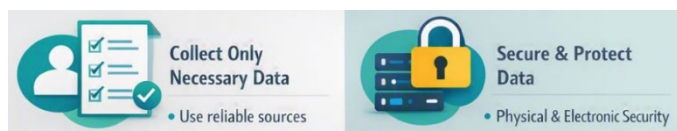
Employees must assume that all Alviva's information is confidential until they know it has been properly disclosed publicly. All employees sign a Confidentiality, Non-Competition, and Inventions Agreement as a condition of employment, which contains more details regarding confidentiality obligations.



In the regular course of business, Alviva accumulates a considerable amount of information. The following principles are to be observed:

11.1 Obtaining and safeguarding information

Only such information as is necessary to Alviva's business should be collected, used, and retained. When personal information is needed, wherever possible it should be obtained directly from the person concerned. Only reputable and reliable sources should be used to supplement this information.



In line with the requirements of POPIA, personal information should only be retained if it is needed or as required by law, and such information should be physically and electronically secured and protected.

11.2 Access to information and confidentiality

Information with respect to any confidential product, plan or business transaction of the organisation, or personal information regarding employees, including their salaries, must not be disclosed by an employee unless and until proper authorisation for such disclosure has been obtained. In addition, operating areas may implement policies and procedures to prevent improper transmission within Alviva of material non-public information concerning publicly traded companies.



12. Treatment of others

Alviva is committed to creating and maintaining a workplace that values diversity, promotes equity, and fosters diversity and inclusion. We expect all employees to deal ethically with and treat all our stakeholder with respect, courtesy, dignity, and fairness, whether they are business partners, consumers, internal Alviva personnel, or competitors. It is Alviva policy to emphasize the excellence of our own products or concepts, and to refrain from criticizing those of our competitors. No one should ridicule a competitor or its product, or take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or by other unfair dealing practice.



Alviva has zero tolerance for harassment, bullying, intimidation, or any form of abusive behaviour, whether physical, verbal, or digital.

Alviva adheres to Broad-Based Black Economic Empowerment (B-BBEE) requirements and international best practices to advance equity and representation.



13. Ethical use of Artificial Intelligence

We recognize the value of Artificial Intelligence (AI) in enhancing efficiency, decision-making, and innovation. Alviva is committed to ensuring that all Artificial Intelligence (AI) tools and applications are deployed and utilized responsibly, ethically, and in compliance with governing standards and regulations, including the King V Code on Corporate Governance. Accordingly, to ensure responsible and ethical use, all employees, contractors, directors and partners must adhere to the principles as set out below. Non-compliance with these standards must be promptly reported for investigation and remediation as set out in 4 above.



13.1 Prohibited uses

AI may not be used for unlawful activities, harassment, misinformation, or any purpose that could harm individuals, the Group, or its stakeholders. The use of AI for manipulative or deceptive practices causing harm, exploiting vulnerable groups (such as children, the elderly, or persons with disabilities), or for social scoring and social control is strictly prohibited.

More specific guidance is provided in the Alviva Acceptable Use of Generative AI IT Policy and the Acceptable Use of IT Policy. It is the responsibility of every employee, director, and contractor to trace the most recent versions of these policies and ensure that they are familiar with these requirements, and to always adhere to them.

13.2 Compliance with laws and policies

Usage must conform to the Group's internal policies, including but not limited to Information Security, Data Privacy, Ethics, and Acceptable Use guidelines.

13.3 Integrity, transparency and explainability

AI must not be used to deceive, manipulate, or misrepresent information. When AI-generated content is used, it should be clearly disclosed where appropriate. AI should be designed for resilience, error prevention, and compliance with cybersecurity standards. Prompt action on non-compliance should be taken, and relevant parties and authorities should be informed or any non-compliance as soon as possible. Appropriate records must be kept related to AI systems implemented and include AI objectives, limitations, risks, and ethical considerations. AI systems that are used to influence decisions should include mechanisms that can provide auditability and explainability so that stakeholders can review, understand and challenge decisions.

13.4 Data privacy and security

AI systems and employees must respect confidentiality and protect personal and sensitive data in line with the Group's data protection standards.



13.5 Fairness, human rights and non-discrimination

AI must not be employed in ways that result in bias, discrimination, or unethical outcomes.

13.6 Human oversight

AI tools must be designed to augment human judgement, not replace it. Employees remain accountable for actions taken using AI tools.

14. Protection of the environment

Alviva adopts a philosophy of management and continuous improvement of our facilities and operations to ensure the protection of the environment and adopts environmentally friendly and sustainable practices, reducing risk associated with supply chain and environmental risks. Hazardous waste and recyclable waste are handled according to applicable international standards and appropriate corporate citizenship.

15. Social media

Alviva recognizes the importance of digital platforms in communication and engagement. Employees must use social media and other digital channels responsibly to protect the company's reputation and mitigate cyber risks. Employees must not expose the organisation, through for example, the use of social media, which could tarnish the image of the organisation or its employees. Employees need to be aware of how they present themselves and Alviva in online social networks, both during and outside of working hours.



Employees must ensure that all online interactions reflect integrity and professionalism. They may not post content that could harm Alviva's reputation or violate laws, regulations, or company policies. Company logos, trademarks, and branding may only be used online with prior authorization. Employees must not create unofficial pages or profiles representing Alviva. Employees may never share confidential, proprietary, or sensitive information on social media or digital platforms. Employees must respect the privacy of colleagues, customers, and partners. Alviva explicitly prohibits the use of social media to participate in anonymous attacks, harassment, and political advocacy using Alviva's identity.

16. Ethics training

Alviva is committed to fostering a culture of integrity and ethical conduct across all operations. To support this commitment all new employees must complete ethics training upon joining the company. Existing employees must ensure that they receive ethics training at least once every two years, or more frequently where specific regulatory or business requirements apply.



Additional training must be required for employees in high-risk roles or when significant policy changes occur.

It is the responsibility of each employee to ensure they remain up to date with ethics training requirements.

Employees must proactively seek refresher training when due and request clarification on any policy or ethical standard that is unclear. Failure to complete mandatory ethics training or to seek clarification when needed may result in disciplinary action.

Alviva provides resources and guidance to help employees understand and apply ethical principles in their daily work. Employees are encouraged to engage with these resources and uphold the highest standards of integrity.

17. If confronted with ethical dilemmas

Employees may occasionally face situations where the right course of action is unclear. Alviva expects all employees to act with integrity and follow these guiding principles when confronted with an ethical issue:

- Act lawfully and transparently;
- Do not conceal problems;
- Report concerns. If an employee cannot resolve an ethical dilemma on their own, escalate it through the appropriate channels;
- When in doubt, ask questions; and
- Acting with honesty and transparency is mandatory.

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Employee acknowledgment of Code of Conduct

Where can I access a copy of the Alviva Code of Conduct?

1. A full copy of the Code of Conduct is attached to this declaration.
2. PaySpace payroll system or your company's intranet (where applicable).
3. Your Human Resources Department.
4. Any member of the management team.

Yes
✓

No
✓

EMPLOYEE ACKNOWLEDGEMENT OF CODE OF CONDUCT:

I have read and taken note of the contents of the Alviva Code of Conduct.

CONFLICTS OF INTEREST DECLARATION:

I **DO NOT** have conflicts or potential conflicts of interest to declare.

I undertake to declare any conflicts or potential conflicts that may arise in the future.

I **DO** have conflicts of interest to declare.

Please provide a summary of conflicts or possible conflicts of interest to declare (your family, outside activities, employment and directorships):

EMPLOYEE:

(All fields below to be completed. If not applicable, state N/A)

Employee signature:		Date:	
Employee name:		Employee surname:	
Subsidiary:		Division:	
HR signature:		Date:	

MANAGER: If potential conflict of interest was declared above, I take knowledge of the conflict and approve of it.

Manager's signature:		Date:	
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