



LIBERTY
In it with you

Code of Ethics | 2022.



Imagine it's possible.



Act with humanity.



Do what matters.



Our Code of Ethics.

Liberty's social and legal licence to operate, and our reputation as a trusted financial services provider, depend on us maintaining an ethical culture. Ethics requires actions that inspire trust in our brand and facilitate accountability. Our Code of Ethics describes the conduct that is expected of employees, the board of directors and group executive committee in response to our stakeholders. Only through ethical conduct can our purpose of improving people's lives by making their financial freedom possible become a reality.

What is the Code of Ethics?

The Code of Ethics defines Liberty's ethical principles as guided by our purpose, leadership principles and habits, founding principles and strategy. It provides structure and guidance for principle-based decision making.

Why a Code of Ethics?

- To ensure **accountability** and **responsibility** for doing the right business the right way
- We are committed to conducting our business **transparently** and with **integrity, honesty** and **fairness**

Using the Code of Ethics

- As a reference point for all Liberty representatives
- For day-to-day business conduct
- Resolving an ethical issue

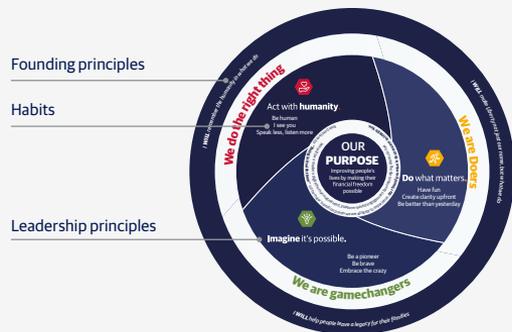
Applicability

Anyone who represents or deals with Liberty is responsible for ethical conduct in terms of the Code of Ethics. Representatives for purposes of the code include:

- Board of directors
- Group executive committee
- Financial advisers and planners
- Employees, part-time employees and casual workers
- Contractors
- Students
- Business partners and suppliers

Our Code of Ethics.

Our founding and leadership principles and effective habits shape our relationships with, and obligations to, our stakeholders. They guide us on behaviours that are most valuable to our improvement – as individuals, a team and a business. We strive to earn and maintain stakeholder trust.



A message from our Group Chief Executive and Ethics Champion

Liberty is committed to being a trusted leader in South Africa and our chosen markets. As a fully-owned subsidiary of the Standard Bank Group, we are aligned to the group principles and code of ethics. We deliver world-class value through exceptional client and adviser experiences. We play a meaningful role in society, while operating a responsible and ethical business. To continue to be able to do so, we must maintain the highest moral and ethical standards.

Our board subscribes to the highest levels of professionalism, integrity and transparency in conducting business and engaging with stakeholders. The board and group executive committee lead effectively by holding each other accountable for decision-making and ethical behaviour. Along with our financial advisers and employees, the Code of Ethics applies to all of us associated with Liberty.

We encourage you to read this Code of Ethics in the context of how it relates to you and your role in the success of the group. It is also a reference to help you report incidents that contradict our ethical and leadership principles or our vision.

Members of Liberty's board and group executive committee are personally committed to upholding our Code of Ethics, and we appeal to you to make the same commitment.

Yuresh Maharaj

Group Chief Executive and Ethics Champion



Our Code of Ethics.

Employees

We commit to:

- Treating people with respect and dignity and providing a safe and healthy work environment.
- Applying the principles of diversity, equity, inclusion and belonging to promote equal employment and development opportunities.
- Evaluating performance fairly and objectively and rewarding employees for their contributions.
- Fostering accountability and acting with integrity by providing clear grievance procedures to address ethics breaches*.



Employees help us **achieve our vision and strategies**. Our **success relies on ethical behaviour** and compliance with internal policies, codes, frameworks, standards and guidelines.

* Examples of ethics breaches include:

- Abuse of company resources
- Abuse of power/position
- Breaches of confidentiality
- Bribery and corruption
- Bullying
- Discrimination
- Dishonesty
- Disorderly conduct
- Insider trading
- Sexual harassment
- Workplace violence

Clients

We commit to:

- Treating clients fairly, honouring obligations and respecting their dignity, while ensuring that all communication – including advertising – is truthful and accurate.
- Building sustainable, trust-based relationships, as we ensure the confidentiality and privacy of personal information is preserved.
- Engaging with and responding to clients in a professional, efficient and effective manner.
- Maintaining objectivity and refraining from inappropriate behaviours, such as coercion or inappropriate influence.



We **act with honour and deliver on our promises**. We establish trust with our clients, treating them respectfully and with dignity and ensuring transparent and accurate communication.



Code of Ethics.

Financial advisers

We commit to:

- Treating our financial advisers respectfully and honestly while maintaining fairness and transparency to build long-term relationships based on mutual trust.
- Remunerating our financial advisers reasonably and commensurately.
- Providing and following procedures to enable financial advisers to raise and resolve grievances promptly, as we protect their privacy and personal information.
- Refraining from inappropriate behaviours, such as coercion or offering cash, gifts or undue incentives.

▶ We **build relationships of mutual trust** with our financial advisers, through honest and transparent communication and by treating them respectfully and fairly.

Civil society

Liberty contributes to social development and environmental sustainability, including:

- Considering the issues that affect the communities we operate in and helping to uplift these communities.
- Achieving a diverse and inclusive workforce.
- Pursuing environmentally sustainable solutions for our resource requirements, including waste disposal and managing and mitigating our impact on the environment.

▶ We **build positive and honest relationships with the communities** in which we operate, considering their needs and helping to uplift them. We **respect the environment**, and maximise our positive social, economic and environmental impacts to mitigate potential negative impacts.

Code of Ethics.

Business partners and suppliers

As a responsible corporate citizen, we commit to:

- Paying suppliers and SMMEs as agreed and in a timely manner.
- Refraining from soliciting or offering bribes.
- Ensuring the confidentiality of the information received from our suppliers, while building ethical relationships with them and treating them fairly.



We **build and maintain mutually beneficial relationships with our business partners and suppliers**, while acting ethically in our dealings with them.

Media

We commit to:

- Building goodwill and trust with the media.
- Engaging in honest and transparent communication.
- Recognising and respecting the media as society's voice while remaining accountable for the transparency of our business conduct and practices.



We **build and maintain mutually beneficial relationships with the media** while adhering to our ethical standards.

Code of Ethics.

Government

We commit to:

- Supporting the development plans of the countries we operate in.
- Aligning with the objectives of Agenda 2063 – Africa's development blueprint; the UN Sustainable Development Goals and the UN Declaration of Human Rights.
- Achieving sustainable economic growth both socially and environmentally by supporting well-governed business practices.
- Creating and enabling an ethical environment, free from bribery and corruption, money laundering and terrorism financing.



As part of a larger world, we imagine it's possible to build a better society. Through our **support of and alignment with Agenda 2063, the SDGs and the UN Declaration of Human Rights**, we demonstrate our intentions to sustain an ethical environment and build our business in a sustainable and honourable manner.

Regulators, policy and lawmakers

We commit to:

- Engaging and cooperating with our regulators.
- Complying with relevant laws and regulatory, directive and supervisory requirements.
- Investigating and reporting suspicious activities to the relevant authorities and encouraging our employees to report non-compliances.
- Refraining from soliciting or offering bribes.



We **maintain the highest levels of compliance**, while instilling an ethical culture throughout our business. Our licence to operate depends on Liberty providing responsible financial services to our clients. Thus, we ensure our business is governed with principle and integrity.

Code of Ethics.

Organised business and professional bodies

We commit to:

- Upholding the principles of fair and just business practices.
- Following professional standards for technical and ethical competence.
- Working with industry and professional bodies to leverage industry synergies to create scale and impact by participating as business and industry role players in matters of common interest.



We **maintain fair and just business practices and support the role of organised business and industry bodies** while working together to create scale and impact.



Ethical decision-making.

Ethical decision-making is a process, guided by:

- Determining what your options are in each situation (use your imagination to generate as many options as possible)
 - Is there a good option to do, or not do something?
- Looking at the concepts of 'good' (the Code of Ethics), the 'self' and 'others' (to be ethical is to consider not only oneself, but also consider what is good for others)

Ethics implies that one is ethical when one does not only consider what is good for oneself, but also considers whether what is '**good**' for the '**self**' is also good for '**others**'!

Remember the golden rule of ethics

Do good to others, as one expects others to do good to oneself.



Our Code of Ethics cannot provide guidelines for every situation that may occur. When you are in doubt, have questions or require further guidance, discuss the issue with your line leader, business unit human capital partner or contact the Ethics Office by emailing ethics@liberty.co.za

†Rossouw, G. J. & Van Vuuren, L. J. 2017. Business ethics (6th edition). Cape Town: Oxford University Press.

Ethical decision-making tool.

Identifying the stakeholders affected by my action or decision

Have I identified or engaged with our stakeholders?

Do I understand the legitimate expectations our stakeholders hold?

Can I make a decision that meets our stakeholders' legitimate expectations?

Have I reviewed Liberty's standards, rules and codes to ensure my decision or action is in line with these?

Evaluating my decision or action

Tenet 1

Can I decide or act so that all stakeholders benefit?
If not, can I decide or act so that the fewest number of stakeholders are harmed by my decisions, and the most benefit (when dealing with an ethical dilemma, for example)?

Tenet 2

Have I considered the rights of people before I decide or act? A decision should pass these two tests:
If I make my decision into a general rule - that everybody can and should do this thing - would the world be a better or worse place to live in?
How would I feel if I was on the receiving end of the decision or action? Would I appreciate how I was treated?

Tenet 3

Is my decision in the best interest of my community?
How would my community react to my action or decision if I were to share it with:
1. The public at large 2. My profession 3. My close family

Tenet 4

Is my action or decision fair to all parties involved?
If my decision does not result in equal treatment, can I justify this through equitable treatment?
Have I communicated why my decision is equitable to the stakeholders involved, and have I justified my decision if people are not treated the same?

Tenet 5

How does the decision or action make me feel as a person?
Is the decision or action helping me to reach my professional and personal potential as a human being?
What does my gut instinct tell me?
These are personal questions and can only be answered subjectively.

How to make an optimal decision

1. Ensure that others are included in your decision-making, such as team members, managers or other employees (*test your thinking with others*).
2. Ensure that your decision is in line with Liberty's values, policies, codes, frameworks, standards and guidelines.
3. Not all the tenets need to be considered, nor should you use this as a checkbox exercise. Instead let the tenets help shape your decisions.
4. Make sure that you can convince your stakeholders that your decision has merit and explain difficulties in the decision or considerations (*communicate to stakeholders how you arrived at this decision*).
5. Remember to balance what is good for the organisation with what is good for its stakeholders.

Encouraging a speak-up culture.

Unethical behaviour at Liberty Holdings Limited or any of its subsidiaries is taken seriously and every incident reported is investigated. Unethical behaviour is decisively dealt with.

Why report

- To expose and minimise workplace misconduct.
- In some instances, failure to report an alleged misconduct may amount to an offence.

Who to report to

- A line leader
- The business unit human capital partner
- The employee relations department
- Group forensic services, whose role is to coordinate issues related to values and ethics across the Liberty Group

Contact the ethics office for advice by sending an email to ethics@liberty.co.za

Details to report

Supply as much information as possible:

- Name of the alleged offender
- Nature of the alleged misconduct
- Place and time where the alleged misconduct occurred
- Names of possible witnesses

Liberty undertakes a **responsible review system** to avoid false or malicious reporting, by comprehensively investigating allegations and verifying the facts.

Reporting channels

Liberty Group Forensic Services

 Online Fraud form via the intranet
(accessible to Liberty employees only)

Forms > Online fraud reporting form

Vuvuzela - The Hotline

 fraud@thehotline.co.za

 0800 63 67 25

 www.thehotline.co.za

Whistle-blower protection

- The independently operated Vuvuzela ethics hotline offers an **anonymous** channel for employees and other stakeholders to report misconduct.
- Liberty provides protection to whistle-blowers **including** to the requirements of the **Protected Disclosures Amendment Act 5 of 2017**. We understand the courage displayed by whistle-blowers and appreciate the benefit this affords us.