

# Umnga Farmers Training Group: Integrity Policy

## Table of Contents

<b>1. Introduction</b> .....	3
<b>2. Core Values</b> .....	3
<b>3. Responsibilities</b> .....	4
3.1 Management and Leadership .....	4
3.2 Employees and Volunteers .....	4
3.3 Partners and Stakeholders: .....	4
<b>4. Code of Conduct</b> .....	4
4.1 Professional Conduct.....	4
4.2 Conflicts of Interest .....	4
4.3 Confidentiality .....	4
4.4 Compliance with Laws and Regulations.....	5
4.5 Environmental and Social Responsibility .....	5
<b>5. Reporting Violations</b> .....	5
<b>6. Enforcement</b> .....	5
<b>7. Business integrity risks</b> .....	5
7.1 Bribery and Corruption .....	6
7.2 Fraud and Theft.....	6
7.3 Competition Law Compliance .....	7
7.4 Money Laundering, Terrorist Financing and Tax evasion.....	8
7.5 Sanctions and Trade Controls.....	8
<b>8. Review and Updates</b> .....	9
<b>9. Conclusion</b> .....	9
<b>10. Contact Information</b> .....	9

## 1. Introduction

At Umnga Farmers Training Group, we are dedicated to fostering a culture of integrity, transparency, and ethical conduct in all our endeavours. This Integrity Policy serves as a framework to guide our employees, volunteers, partners, and stakeholders in upholding the highest standards of integrity within the agricultural training sector in South Africa.

### Purpose and scope

The aims of this policy are to:

- Define key core values of integrity.
- Establish the principles and requirements for employees, contractors and workers representing Umnga Farmers Training Group to comply, at a minimum, with applicable business integrity laws and regulations; and
- Promote a culture of honesty, ethics and integrity within Umnga Farmers Training Group.

### What is business integrity?

Business integrity means conducting business honestly and with strong moral and ethical principles. In practice, this means doing what we say we are going to do, owning up to our mistakes and holding each other accountable for our actions. Conducting business with integrity involves living our values through our actions, behaviours and decisions and having the character and courage to always do what is right, not what is easy, even if we do not think anyone is watching. Business integrity is fundamental to building and maintaining trust with all our stakeholders; including our customers, clients, business partners, employees, suppliers, the communities in which we operate, governments, public bodies and investors.

## 2. Core Values

Our Integrity Policy is rooted in the following core values:

- **Integrity:** We are committed to honesty, fairness, and accountability in all aspects of our operations.
- **Respect:** We treat all individuals with dignity, respect, and professionalism, regardless of background or status.
- **Excellence:** We strive for excellence in our training programs, services, and interactions with stakeholders.
- **Transparency:** We maintain transparency in our operations, decision-making processes, and communication.

- **Environmental and Social Responsibility:** We are dedicated to promoting sustainable agricultural practices and social responsibility within the communities we serve.

### 3. Responsibilities

#### 3.1 Management and Leadership

- The management team is responsible for championing integrity and ethical behaviour throughout the organisation.
- Leaders are expected to lead by example, demonstrating ethical leadership and fostering a culture of integrity among employees and volunteers.

#### 3.2 Employees and Volunteers

- All employees and volunteers are required to familiarise themselves with this Integrity Policy and adhere to its principles.
- Employees and volunteers must conduct themselves with honesty, professionalism, and integrity in all interactions with learners, colleagues, and stakeholders.

#### 3.3 Partners and Stakeholders:

- Partners, suppliers, contractors, and other stakeholders are expected to uphold similar standards of integrity and ethical conduct in their engagements with Umnga Farmers Training Group.

### 4. Code of Conduct

#### 4.1 Professional Conduct

- Employees and volunteers must conduct themselves professionally and ethically at all times, treating learners, colleagues, and stakeholders with respect and courtesy.
- Discrimination, harassment, or any form of unethical behaviour will not be tolerated.

#### 4.2 Conflicts of Interest

- Employees and volunteers must avoid conflicts of interest and disclose any personal, financial, or professional interests that may affect their ability to fulfil their duties impartially.
- Conflicts of interest must be disclosed to management and appropriately managed to prevent any adverse impact on the integrity of our training programs.

#### 4.3 Confidentiality

- Employees and volunteers must respect the confidentiality of learner information, proprietary data, and sensitive organizational information.

- Confidential information should only be accessed and disclosed on a need-to-know basis and with proper authorization.

#### **4.4 Compliance with Laws and Regulations**

- Umnga Farmers Training Group is committed to compliance with all relevant laws, regulations, and industry standards governing agricultural training and education.
- Employees and volunteers must ensure that their actions and decisions comply with applicable laws and regulations.

#### **4.5 Environmental and Social Responsibility**

- We are dedicated to promoting environmentally sustainable agricultural practices and social responsibility within the communities we serve.
- Employees and volunteers must prioritize environmental conservation and social welfare in their training programs and interactions with learners.

#### **5. Reporting Violations**

- Umnga Farmers Training Group encourages employees, volunteers, learners, and stakeholders to report any suspected violations of this Integrity Policy or unethical behaviour through designated channels, such as the whistleblower hotline or reporting to management.
- Reports will be treated confidentially and investigated promptly and impartially. Appropriate disciplinary action will be taken against individuals found to have violated this policy.

#### **6. Enforcement**

- Violations of this Integrity Policy may result in disciplinary action, up to and including termination of employment, for employees, or termination of partnership for external stakeholders, depending on the severity of the offense and applicable laws.
- Umnga Farmers Training Group reserves the right to take legal action against individuals or entities engaged in fraudulent, corrupt, or unethical behaviour that undermines the integrity of our training programs or organizational values.

#### **7. Business integrity risks**

Business integrity risks covered under this policy include Bribery and Corruption, Fraud and Theft, Competition Law Compliance, Money Laundering, Terrorist Financing and Tax evasion, Sanctions and Trade Control.

## 7.1 Bribery and Corruption

Bribery occurs when someone directly or indirectly offers, promises, gives to or accepts or requests a financial or other advantage from anyone intending that the person receiving the benefit improperly performs their duties or obligations. An advantage can include anything of value such as money, gifts, hospitality, favour, improper signing bonus or rebates, donations, sponsorships or community investments. It could also include non-monetary benefits or an opportunity, such as the promise of employment for a family member or close friend.

Corruption is an abuse of entrusted power (for example; by a company's official) for private gain, typically involving bribery. All forms of bribery are business integrity risks. Umnga Farmers Training Group personnel are required to recognise and to escalate them appropriately.

### Our Principle

Umnga has zero-tolerance to bribery or corruption and our personnel must not engage in or implicitly authorise bribery or corruption under any circumstances.

### Areas of Risk

- ❖ Facilitation payments
- ❖ Gifts and hospitality
- ❖ Donations
- ❖ Sponsorships
- ❖ Community support/investment
- ❖ Potential or actual conflict of interest
- ❖ Travel and expense
- ❖ Third party engagement

## 7.2 Fraud and Theft

**Fraud** means being untruthful (either by what you do or do not do) or using your position inappropriately for your own benefit. It may include situations when an employee obtains personal gain or advantage at Umnga Farmers Training Group's expense, such as fraudulent financial reporting or expenses, manipulation, falsification or alteration of a document, account or submission, falsification of books and records.

**Theft** means taking the personal benefit of that which does not belong to you. Fraud is often closely connected to many other types of financial crime, including bribery and corruption, insider trading, money laundering, sanctions, and tax evasion.

### Our Principle

Umnga Farmers Training Group personnel must not knowingly be involved with or commit fraud or theft.

### **Areas of risk**

- ❖ Asset misappropriation
- ❖ Financial and Non-Financial Reporting

### **7.3 Competition Law Compliance**

The purpose of competition or anti-trust law is to ensure that businesses compete and gain business on a level playing field by promoting equitable and free competition within industry and between commercial entities. Competition laws are present in the majority of countries worldwide, which dictate that companies are prohibited from eliminating, reducing, or distorting competition in any markets in which they operate. In general, competition law aims to prohibit the abuse of a dominant position or substantial market power, as well as the prohibition of anti-competitive agreements and practices, despite the fact that the scope and content of applicable competition law may differ from region to region.

Domestic laws could potentially apply to conduct that occurs outside national boundaries, as the majority of competition laws extend beyond national boundaries. That is why it is imperative that we adhere to the regulations outlined below in all of our operations. Umnga Farmers Training Group personnel may be subject to civil and criminal penalties as a result of anti-competitive behaviour, which can also harm our brand and reputation. Umnga Farmers Training Group may be subject to extensive investigations that could result in civil and criminal penalties, as well as damages claims. Additionally, individuals may be found culpable of committing a criminal offence.

### **Our principle**

Umnga Farmers Training Group is a company that can and does win business fairly. Our personnel must comply with competition laws – or antitrust laws - to uphold Umnga's commitment to compete fairly with competitors to secure the trust of Umnga's customers, suppliers, and its other stakeholders.

### **Areas of risk**

- ❖ Agreements and arrangements with competitors
- ❖ Inappropriate information exchange with competitors
- ❖ Participation in trade association or industry events
- ❖ Vertical agreements between different levels of the supply chain
- ❖ Abuse of dominance
- ❖ Joint ventures

#### **7.4 Money Laundering, Terrorist Financing and Tax evasion**

Crime of all varieties frequently produces a benefit, which is sometimes referred to as the proceeds of crime. This benefit may include the acquisition of property or the creation of profits. Money laundering is the process of concealing or disguising the proceeds of illicit activity in order to maintain their control by criminals. The receipt or transaction in criminal property, including by blameless third parties, is included.

Terrorist financing encompasses the receipt or provision of money or property that is intended for, or has the potential to be used for, the purposes of terrorism or terror property laundering. It is frequently associated with the laundering of money. Tax evasion is the unlawful failure to pay or underpay taxes in any country on Earth. The facilitation of tax evasion is the deliberate assistance of another individual in committing tax evasion or any other form of complicity in their actions.

#### **Our Principles**

If you are aware or should have reasonably suspected that the money or other assets that Umnga Farmers Training Group receives (e.g., from a third party including a customer, supplier, or joint venture partner) are the proceeds of crime or are tainted by criminal or terrorist conduct, or if Umnga Farmers Training Group is involved in an arrangement whereby money or other property will be used for terrorist activity, you may be guilty of money laundering and terrorist financing offences. Umnga Farmers Training Group does not condone or facilitate money laundering, terrorist financing, or tax evasion.

#### **Areas of risk**

- ❖ Handling proceeds of crime
- ❖ Facilitating tax evasion/failure to prevent tax evasion

#### **7.5 Sanctions and Trade Controls**

Wherever it operates, Umnga Farmers Training Group is dedicated to conducting its business in a transparent and ethical manner. All pertinent laws and regulations, including sanctions and trade control programmes ("sanctions programmes"), must be adhered to as part of this culture.

Governments and intergovernmental organisations implement sanctions programmes that prohibit or restrict transactions with or between specific individuals, entities, sectors, and/or countries. Umnga Farmers Training Group adheres to a variety of domestic and international sanctions programmes. These programmes may pertain to the countries in which we conduct business, the identities of our customers, the individuals who work for us or on our behalf, the methods by which we conduct transactions, and the banking services we employ.

Umnga Farmers Training Group is committed to implementing effective and essential measures to mitigate the potential consequences of violating trade controls and sanctions regulations. Compass



does not engage in direct or indirect interactions with sanctioned parties without prior approval that the potential transaction does not contravene applicable sanctions or otherwise subject Compass to unnecessary risk. Any activity that involves countries, individuals, entities, commodities, or services that are subject to trade controls or sanctions is only permissible when the necessary approvals, licenses, or exemptions are in place.

### **Our Principle**

Umnga respects and adheres to all sanctions programs that apply to our company. We do not do business with sanctioned individuals, entities, sectors, or countries. You must not under any circumstances knowingly enter into any form of transaction or commercial relationship that could potentially violate the sanctions programmes applicable to Compass. This includes transactions involving individuals or entities on sanctions lists, transactions involving sanctioned countries or prohibited transactions with sanctioned sectors.

### **AREAS OF RISK**

- Entering into new sectors/new territories
- Entering into new third-party relationships
- New sanctions/asset freezes on existing third parties

### **8. Review and Updates**

- This Integrity Policy will be reviewed periodically to ensure its effectiveness and relevance in guiding our conduct and operations.
- Updates or revisions to the policy may be made as necessary to address emerging issues, changes in laws or regulations, or feedback from stakeholders.

### **9. Conclusion**

By adhering to the principles outlined in this Integrity Policy, we demonstrate our commitment to promoting integrity, transparency, and ethical conduct within the agricultural training sector in South Africa. Together, we can uphold the highest standards of professionalism and integrity, ensuring the success and sustainability of our training programs and the empowerment of learners in the field of agriculture.

### **10. Contact Information**

For any questions or further information about this policy, please contact:

- **Executive Director:** Johann Stassen

- **Email:** info@umnga.africa
- **Phone:** 051 444 0201
- **Address:** 3 Boerneef Street, Langenhoven Park, Bloemfontein, 9301

### Approval details of the policy

<b>Approved by</b>	Board of Umnga Farmers Training Group NPC
<b>Date of Approval</b>	24 June 2024
<b>Implementation Date</b>	1 July 2024
<b>Review Date</b>	1 July 2026
<b>Signature:</b> <b>Name:</b> Johann Stassen <b>Position:</b> Executive Director	