

# Ethics Training Statement



## Purpose

To outline Capitec's approach towards training employees on their roles and responsibilities in terms of managing and maintaining an ethics culture.

## Read along with this content

Ethics Management Framework  
The heart of Capitec: our Ethics Statement  
Code of Conduct

## Version

V01

## Effective Date

31/05/2023

## Document Adherence

All employees

## Committee to Approve

Sustainability Committee

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## 1. Overview

- 1.1 To ensure that an ethical culture is embedded in Capitec's way of doing business, consistent and ongoing training is required for all levels of employees to effect positive ethical behaviour change.
- 1.2 Employees must receive ethics training to ensure employees are educated on Capitec's ethics management procedures and supported to ensure employees are equipped to make decisions aligned to Capitec's core ethical values based on our CEO values and leadership principles.
- 1.3 Capitec must ensure that its training programmes educate employees on at least:
- Their ethical responsibilities relating to each other, the organisation, the society, and our clients.
  - The reporting channels of any ethical risks, issues, or queries.
  - Access to information on ethical management.
  - Measures taken by Capitec to promote ethics.

## 2. Scope and application

This statement applies to Capitec and all its employees. For the purposes of this document "employees" include permanent, fixed term or contract employees who are employed by Capitec.

## 3. Minimum Training Requirements

### 3.1 Scope of ethics training

- 3.1.1 Training should be focussed on achieving the following three types of ethics competence:



### **3.2 Focus areas in the ethics training**

The following focus areas may be covered in the ethics training:

- Capitec's ethical values
- Ethical decision making
- Code of Conduct (which includes amongst other discrimination, harassment and bribery and corruption)
- Gifts & Invitations
- Whistleblowing
- Conflict of Interest

### **3.3 Ethics training presentation methods**

3.3.1 There is no single solution when determining how to deliver training, a mix of training techniques may be appropriate. Ethics training may be presented face to face (classroom-based), one on one (on-the-job training), through electronic communication or online based training as is deemed relevant for the purpose.

3.3.2 A record of all training presented must be recorded and maintained in order to evidence to any supervisor or independent third party that training was provided and understood by the employee. This may take the form of either an attendance register, an acknowledgement of confirmation by the employee (specifically where one-on-one training takes place) or maintained on a system.

### **3.4 Ethics training periods**

#### **3.4.1 Annual**

To ensure that an effective general awareness training and a refresher programme is implemented and maintained for all relevant employees, training must be completed by all relevant employees on an annual basis or as required.

#### **3.4.2 Onboarding**

All new employees must receive relevant ethics training as part of the onboarding learning modules.

### **3.5 Failure to complete training**

Employees must achieve the designated pass-rate on ethics testing materials or any other ethics training where testing is to be implemented, to be considered to have successfully completed the training. If an employee fails to achieve the designated pass rate in their first attempt, they will be allowed to retake the assessment until such time that the employee pass to ensure that the employee understands and comprehends the ethics training.

## **4 Record keeping**

Records of training material as well as the attendance/completion record must be maintained by the Ethics Office and/or the Learning and Development department, where applicable. It must be stored in such a way that it can be easily extracted for reference and reporting purposes. Records are kept for a period of 5 years from the conclusion of the training date.