



CODE OF ETHICS

1. Application

This code of ethics shall in respect of the Fidelity Security Group of companies, apply to its shareholders, directors, managers, employees, suppliers, financiers, clients and its competitors.

2. Managers

All managers in the Fidelity Security Group of companies shall:

Obligations to all:

- 2.1 communicate this code to all parties concerned with the Group.
- 2.2 observe the provisions of, and promote compliance with this code.
- 2.3 promote and maintain confidence in the integrity of the Group.
- 2.4 adhere to all applicable laws of the jurisdictions in which they operate.

Obligations to clients:

- 2.5 accurately and transparently market the Group's services.
- 2.6 charge an agreed and fair price for the Group's services.
- 2.7 supply services appropriate to the client's reasonable needs and expectations.
- 2.8 ensure that services provided conform to minimum quality standards.
- 2.9 ensure that clients are aware of differing service categories and the corresponding service fees of each.
- 2.10 provide clients with the means for lodging complaints about service shortcomings.
- 2.11 constantly strive to reduce inefficiencies.
- 2.12 maintain costs at the lowest reasonable level.
- 2.13 encourage employees to maximize the use of the Group's limited resources.

Obligations to shareholders:

- 2.14 act within their limits of authority.
- 2.15 carry out their duties with skills, care and due judgement.
- 2.16 report timeously and accurately.
- 2.17 not divulge or improperly use confidential information.
- 2.18 vehemently oppose secret profits, bribes, unconscionable benefits and conflicts of interest.

Obligations to suppliers:

- 2.19 ensure good buying practices.
- 2.20 disclose to all appropriate parties any bribes or attempted bribes.
- 2.21 terminate dealings with suppliers guilty of offering bribes.
- 2.22 report honestly the financial position of the Group.
- 2.23 refrain from any act that may compromise or put suppliers at unjustified risk.

Obligations to employees:

- 2.24 deal courteously, openly and fairly with employees and elected representatives.
- 2.25 give due attention to employee training and development.
- 2.26 provide safe working conditions.
- 2.27 implement fair and adequate remuneration policies.
- 2.28 comply with all labor legislation.
- 2.29 not discriminate unfairly.
- 2.30 provide a facility for protected reporting of any misdemeanor.

Obligations to competitors:

- 2.31 refrain from dishonest allegations about competitors.
- 2.32 not seek to acquire confidential competitor information by improper means.

Obligations to society:

- 2.33 pay due regard to environmental and public health safety.
- 2.34 participate within the means of the Group, in community upliftment programs.

3. Employees

All employees in the Fidelity Security Group of companies shall:

Obligations to clients:

- 3.1 respect the confidentiality of client information.
- 3.2 assist fellow employees to meet their obligations.

Obligation to shareholders:

- 3.3 avoid unreasonable disruption of services to clients.
- 3.4 endeavor to develop their own potential.
- 3.5 not divulge or misuse confidential information.
- 3.6 act honestly and report dishonest or harmful practices.
- 3.7 honor their terms and conditions of employment.

Obligation to managers:

- 3.8 support management in compliance with this code.
- 3.9 refuse any bribe and report any attempted bribes to peers or management.
- 3.10 report any harmful or potentially harmful practices or incidents.
- 3.11 refrain from unreasonable industrial action.
- 3.12 commit to productivity improvement and avoid wasting resources.

Obligations to fellow employees:

- 3.13 not make false accusations against fellow employees.
- 3.14 not intimidate fellow employees.
- 3.15 recognize the rights of fellow employees to freedom of speech and association.

Obligations to society:

- 3.16 pay due regard to environmental and public health considerations.

4. Shareholders

All shareholders in the Fidelity Security Group of companies shall:

- 4.1 appoint directors and managers capable of fulfilling the Group's obligations.
- 4.2 make known the professional attributes of the directors, and the value they are individually expected to add to the affairs of the Group.
- 4.3 support management communication of this code.
- 4.4 confer on management sufficient authority to carry out their responsibilities.
- 4.5 refrain from any actions that compel managers to act injudiciously or unethically.
- 4.6 refrain from dishonestly manipulating the market value of the Group.
- 4.7 not divulge confidential information.
- 4.8 not misuse information that is not available to stakeholders at large.

5. Suppliers and Financiers

All suppliers and financiers to the Fidelity Security Group of companies shall:

- 5.1 strive to provide goods and services of good quality which comply with agreed standards at competitive prices, within expected delivery periods.
- 5.2 assist the Group in meeting its obligations.
- 5.3 not unjustifiably or unreasonably withhold facilities, goods or services.
- 5.4 enforce unfair conditions or obligations through taking advantage of a dominant market position.
- 5.5 not pay bribes and shall report any seeking of bribes.

6. Clients

All clients of the Fidelity Security Group of companies shall:

- 6.1 pay the Group for services rendered in accordance with the agreement between the parties.
- 6.2 not unreasonably divulge confidential or potentially harmful information about the activities or services of the Group.

7. Society at large

The people and Government of South Africa shall:

- 7.1 provide the Group with reasonable opportunity to trade.
- 7.2 provide sufficient officials to maintain public order and a crime free environment.
- 7.3 not impose unjustifiable restrictions or unreasonable burdens.