

# Clear Horizons

*"The Consulting Company"®*

*Your 24/7 Consultants®*



TO US, Doing the right thing requires understanding the ethical implications of the underlying choices. It can be challenging, but ethical behaviour pays off. Take a stand when you see a problem. When in doubt, ask! Asking is a sign of strength, not weakness. Our Code of reinforces our values and drives our culture of accountability. Our values shape the culture and define our character. Introduction

At Clear Horizons, we measure success not only by the results we achieve, but how we achieve them. Every decision and action we take is driven by the highest sense of and professional integrity. Our Code inspires you to take integrity beyond, into action. Our commitment goes beyond compliance.

We live integrity daily, respecting our people and creating an apt work environment unifying our team creating a stronger Company. We inspire everyone to succeed, making Clear Horizons one of the most respected business advisors in the world.

A Code cannot address every workplace situation. Sometimes, a law or policy dictates the outcome. In such a case, do what you feel is right and ensure consistence with the Code.

*Throughout this document, "Clear Horizons," "The Consulting Company" or the "Company" refer to The Clear Horizons (Private ) Limited Company and subsidiaries, including joint ventures, agents or affiliates.*



# Our Ethics Code At a Glance...

## **At Clear Horizons our sure promise to you all is that We:**

- ✓ Will foster an inclusive environment that values individual uniqueness
- ✓ Will treat each other with respect and not tolerate harassment
- ✓ Maintain a safe and nonthreatening workplace
- ✓ Handle “inside information” appropriately and lawfully
- ✓ Avoid discussions on confidential information, even with other employees, unless it is necessary for their job performance
- ✓ May not use any information about Clear Horizons or its clients or suppliers for personal gain.
- ✓ Will never corrupt others to make impartial business decisions in the best interests of Clear Horizons
- ✓ Will give personal opinions and not create an impression to be representing or are expressing the views of Clear Horizons as Company spokesmen
- ✓ Will all act like owners of the company
- ✓ Will share our deep experiences to maximize its value
- ✓ Will protect and invest in Clear Horizons' assets and safeguard proprietary information
- ✓ Will use electronic ICT responsibly and professionally
- ✓ Will encourage appropriate participation in political activities
- ✓ Will remain a good corporate citizen and follow consistent global standards
- ✓ Will be fierce but fair competitors
- ✓ Live our global brand
- ✓ Will foster an environment conducive to personal development
- ✓ Will respect divergence of points of view
- ✓ Will ensure our personal relations do not compromise Clear Horizons' objectivity
- ✓ Respect prior employment obligations
- ✓ Build long-term relationships with clients based on value delivered.
- ✓ Commit to what we can deliver and deliver what we commit
- ✓ Value our clients' codes of conduct in this diverse world
- ✓ Purchase goods and services on their merits and expect our clients to follow suit



### **Unquestionable Integrity & Ethics**

Integrity means recognising right from wrong and understanding the ethical implications of our choices. We will take our stance openly even if it unpopular. We will give credit to the deserving, admitting our mistakes and making them storybooks from which we learn. We meet our commitments, however small, and take a stand when we see a problem. We inspire trust by taking responsibility, acting ethically and encouraging honest, open debate.

### **Client Value Policy**

We build long term client relationships based on delivering win-win value. Our mission is to help clients become high-performance organisations. We understand client expectations and strive to delight them. The Company gains credibility with clients by challenging proposals unlikely to solve client challenges. Being honest and courageous is not only right, it saves us from inevitable criticism when client says "Why didn't you tell me?" Such criticism undermines our reputation.

### **Clear Horizons Values**

Our values founded this Code becoming an integral part of our practice. We encourage mutual respect, where everyone understands and recognises diversity among our employees, customers, communities and other stakeholders. We attract, hire and retain talented and motivated people wishing to excel and realise their highest potential. Clear Horizons' policy is to be lawful, highly principled and socially responsible in all of its business practices.

We always guard our statements knowing they can be degrading, offensive or humiliating. Innocent actions can be offensive to others. Whatever form of harassment and violates Clear Horizons' policy and include: unwelcome sexual advances, unsolicited physical contact, propositions, unwelcome flirtations, or offensive verbal, visual or physical conduct of a sexual nature. Graphic or visual displays such as posters, pin-ups, or electronic pictures, video clips, or e-mail messages are equally unacceptable.

### **Respect for People**

Our principle is valuing diversity, and treating people as we would like to be treated ourselves. We believe in the inherent worth of all people. We, are the Company's engine of value creation; our imagination, hence essential to growth. We celebrate and reward unique backgrounds, viewpoints, skills, and talents of everyone at Clear Horizons. Our communities are our neighbours; their acceptance of us is vital to our ability to operate. Our shareholders are the beneficiaries of our success.

### **Books and Records**

We rely on accounting records to produce reports for the Board, Management, Shareholders, and Others. These records must accurately and fairly reflect the Company's assets, liabilities, revenues and expenses. In addition to the Code, the CEO and senior financial officers are bound by this and a separate code of ethics individually signed. Clear Horizons is committed to financial integrity for the benefit of our stakeholders. All must ensure no false or intentionally misleading entries are made in accounting records. Misclassification of transactions violate the law and the Code. All transactions must be supported by accurate documentation in reasonable detail, recorded in the proper account and period. All employees are expected to demonstrate financial integrity in processing Travel and Expense Reports and other financial transactions. Cash or other assets must not be maintained in any unrecorded or "off-the-books" fund for whatever purpose.

### **Use of Company Resources**

Company resources are primarily for business use. These include vehicles, computers, telecommunications and intellectual property. Staff may occasionally use Company resources, such as a copy machine, Internet access, telephone, or e-mail, for personal, non commercial use. Personal use is acceptable provided there are no measurable increased costs, and co-workers are not distracted.



### **Information Systems and Data**

Computers and all information on Company computers, as well as on your home computer or other device, are Company property. Protect any passwords providing access to Company networks. You are responsible for what you say in an e-mail message. Do not use your Clear Horizons title or contact information for personal mail, e-mail or anything other than Company business. This is because Clear Horizons relies on Computer systems and Telecommunications to work effectively.

### **Confidential Information**

Confidential information includes trade secrets, proprietary know-how, personnel records, business plans and proposals, capacity and production information, marketing or sales forecasts and strategies, client and customer lists, pricing lists or strategies, industrial designs and plans, supplier data, business leads, and research and development (R&D) information. All are responsible for protecting confidential information, which is for Company business use only. Disclosure by omission or commission is illegal except on legal compulsion.

We respect the trade secrets, copyrights, trademarks, and patent rights of others. We expect nothing less when our property is the subject. Should you leave Clear Horizons, you have a continuing obligation to protect Clear Horizons confidential information. Improper receipt of others' confidential information exposes us to potential legal liabilities while improper disclosure may result in the loss of valuable intellectual property rights. This applies to Company information as well as to information that belongs to another entity such as a customer, supplier or competitor.

### **Inside Information and Trading**

Sometimes, staff have inside information about the Company or its clients unknown to the investing public. Such inside information may relate to plans; new products or processes; mergers, acquisitions or dispositions of entities, businesses or securities; problems; sales; profitability; negotiations relating to significant contracts or business relationships with others; significant litigation; or other financial information. We are all bound by insider trading regulations against "tipping" or telling others about insider information.

### **Questionable Payments**

It is against Company policy to make unlawful, improper or other kinds of questionable payments to customers, government employees or officials, or other parties. We conduct business and sell our products on the merits of price, quality and service and do not offer expensive gifts, bribes or other benefits to influence their decisions. We expect our customers to purchase our products and services on the same basis and refuse to offer or receive bribes.

To bribe is to provide something of value, gifts, hospitality or entertainment to influence a decision to do business with Clear Horizons. Transactions should be impartial, objective and free of outside influence. Casual, modest gifts, favours and entertainment are often used to strengthen business relationships. However, no gift, favour or entertainment should be accepted or given if it obligates to influence fair judgment. No employee should receive or pay anything that could cause embarrassment to or discredit the Company if disclosed.

### **Gathering Competitive Information**

In business, we are fierce but fair competitors, and a good corporate citizen. We expect all who collect or use competitive intelligence for the Company to use publicly available information and not illegal (theft, bribery, misrepresentation or espionage through electronic devices) or unethical business means. Gathering information about our competitors is a legitimate business activity when done lawfully and ethically. We certainly do not search through our competitors' trash or allow others to do so for us. Competition is fundamental to our success—but never at the expense of acting ethically and lawfully.

### **Records Management**

Records and information are important assets of the Company. We must preserve these to realise their full value. These are entrusted you every day. Mismanaging or even deliberately releasing these could provide



others an unfair business advantage harmful to us. Individual responsibility in day-to-day activities is to effectively record information daily.

### Political Activities

The Company encourages all to be active members and contribute to their communities by participating in local, national and international political processes. However, be guided ethically that as a private citizen, you are free to contribute to causes, candidates or political parties of your choice. Personal views expressed in public fora (like letters to newspapers), reflect personal opinions and should not use Company letterhead or Company e-mail, business address or title. Clear Horizons, as a legal persona, has neither body nor soul, hence incapable of having a political opinion. Clear Horizons recognises and encourages that we all identify the line of divide between being a private citizen and Company spokesperson.

### Communications with the Public

The continuing development of international codes of conduct and principles governing corporate social responsibility are positive indicators for redefining business accountability for the 21st century. Clear Horizons respects and supports the efforts of others in such endeavours and also recognizes that every global code of conduct and/or social responsibility initiative may have a significant impact on our Company's operations and businesses worldwide. Clear Horizons will continue to review and understand the implications of the initiatives in order to remain consistent, wherever possible, with those external codes.

### The Five Cs in Action:

#### 1. Communicate

Keeping others informed using discretion to share information with those who need to know, facilitating future contacts and ensuring you are not alone in a difficult situation.

#### 2. Consult

Integrating others into the decision process, reaching out to those who have skills, capabilities, qualifications or experience that you do not—for instance, someone from Finance, Legal, a Quality executive or simply someone who has experience doing what you are trying to do.

#### 3. Cross-check

Having someone else check your thinking to confirm you have not missed an issue or misread a situation.

#### 4. Collaborate

Taking a multidisciplinary approach, especially with the bigger decisions, ideally by using a teaming, nonhierarchical, partnering approach.

#### 5. Courage

Speaking out for what you know is right and acting on it even when taking a principled stand may not be easy. Asking for help is a sign of strength, not weakness.

The Code of Business Ethics applies to all Clear Horizons people – directors and employees in every consulting division. For entities in which Clear Horizons has an interest but not control, we encourage the code's adoption. Associate consultants, agents and independent contractors are required to comply when acting on our behalf.

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