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NATIONAL LOTTERIES COMMISSION
a member of **the dti** group

National Lotteries Commission (NLC)
P O Box 1556
Brooklyn Square 0083, Pretoria

SUMMARISED NLC ETHICS AND CONDUCT POLICY

PURPOSE: TO DEFINE AND MAINTAIN ETHICAL AWARENESS THROUGHOUT THE ORGANISATION

1. Purpose

The purpose of the policy is to ensure a consistent and fair approach to the ethics and conduct management in the NLC in order to guide employees to achieve and maintain the agreed standard of conduct, performance and behaviour in the work environment. This code is aligned to relevant legislation and best practice

2. Application

The policy shall apply to all employees of the NLC. NLC employees must adhere to any policy directive or code of ethics approved by the Board and applicable with the public sector.

3. Policy

To safeguard the NLC's reputation and credibility, all employees must conduct themselves in accordance with the highest ethical standards.



CHANGING LIVES

Board Members: Ms A. Brown (Minister's Representative) Ms. DLT Dondur Mr. YN Gordhan Adv. WE Huma
Ms TS Kekana Dr MA Madzivhandila Prof NA Nevhutanda (Chairperson) Ms Nompumelelo Nene (Company Secretary)

Established in terms of the Lotteries Act 57 of 1997, as amended

4. Employees

The NLC will respect the human rights of its employees, treat them with dignity and respect, provide safe work conditions, and protect the confidentiality of employee records. Actions that constitute harassment or discrimination will not be tolerated.

5. Licensee, Suppliers, Beneficiaries and Applicants

To safeguard the NLC's reputation and credibility, all employees must conduct themselves in accordance with the highest ethical standards.

6. Business Integrity

a. Business principle

NLC employees must avoid conflicts of interest between their private financial activities and the conduct of the NLC business

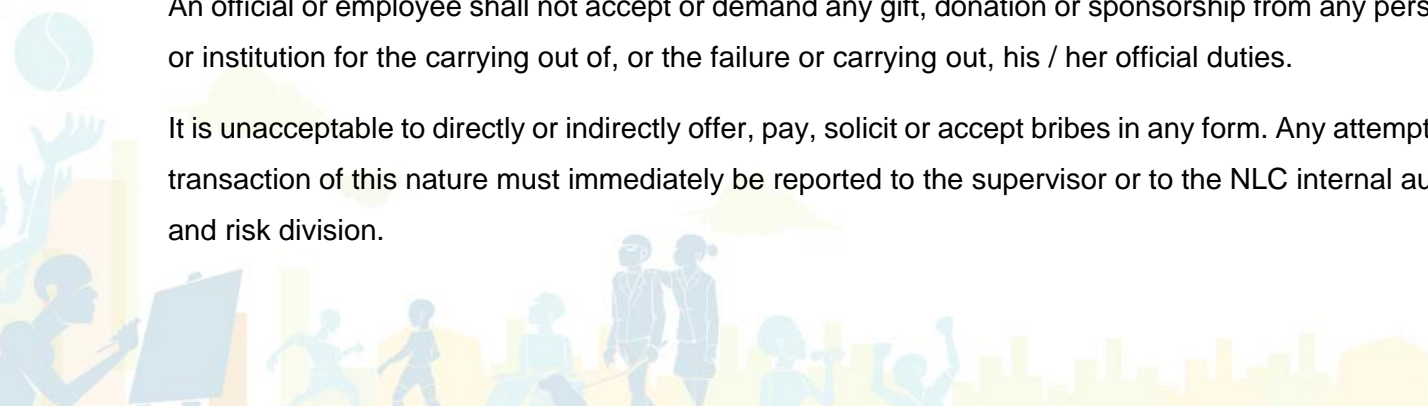
b. Conflict of Interest

The NLC expects its employees to perform their duties conscientiously, honestly and in accordance with the best interest of the NLC and its stakeholder. NLC employees shall at all times conduct themselves in manner that enhances the reputation of the NLC and shall avoid engaging in any activity that may undermine the integrity of the Commission or placing themselves in a position that could lead to perceived or actual conflict of interest.

c. Gifts, Entertainment and bribery

An official or employee shall not accept or demand any gift, donation or sponsorship from any person or institution for the carrying out of, or the failure or carrying out, his / her official duties.

It is unacceptable to directly or indirectly offer, pay, solicit or accept bribes in any form. Any attempted transaction of this nature must immediately be reported to the supervisor or to the NLC internal audit and risk division.



d. Integrity of financial information

Employees have a responsibility to ensure that transactions are recorded in the NLC accounts accurately and promptly and they must immediately report any known inaccuracies.

PURPOSE: TO DEFINITION AND MAINTAIN ETHICAL AWARENESS THROUGH THE NLC

1. Protection and use of property

It is the responsibility of every employee to implement, maintain and enhance the effectiveness of the environment in which they operate.

2. Business controls

Managers and supervisors must ensure that effective system of business controls are in place for their area of responsibility.

Employees must ensure that transactions are conducted within their level of authority and in accordance with prescribed policies and procedures.

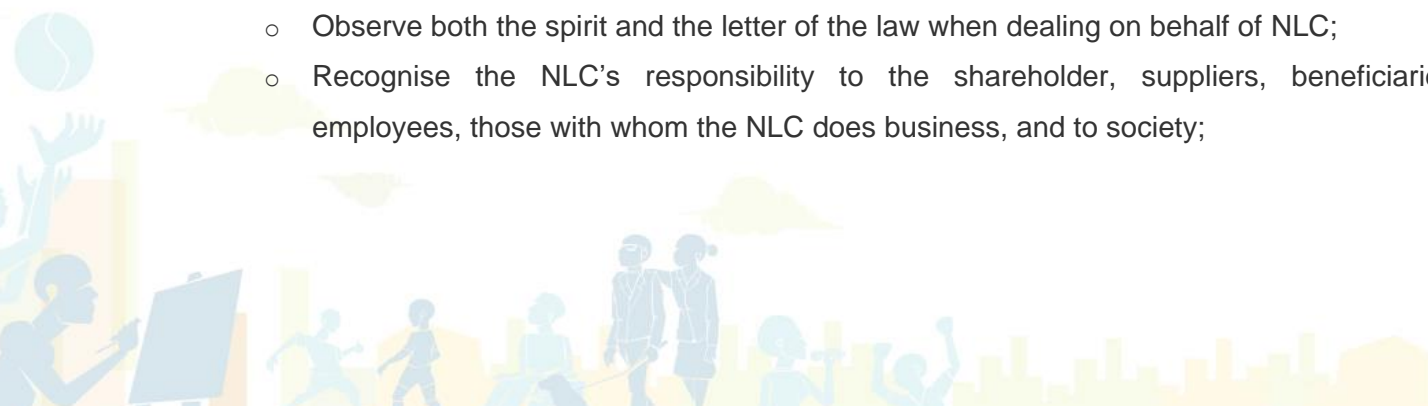
3. Confidential Information

Employees of the NLC may not use their position or privileges, or confidential information obtained as and employee of the NLC, for personal gain or to improperly benefit another person.

4. Accountability

All employees must understand and adhere to NLC Ethics and Conduct Policy. They must:

- Commit to individual conduct in accordance with the NLC Code
- Observe both the spirit and the letter of the law when dealing on behalf of NLC;
- Recognise the NLC's responsibility to the shareholder, suppliers, beneficiaries, employees, those with whom the NLC does business, and to society;



- Conduct themselves as responsible members of society, giving due regard to health, safety and environmental concerns, and human rights, in the operation of the NLC business; and
- Report any suspected breach of the law or this Code to the Ethics Office or the Internal Audit Division or the Board, who will protect those who report violations in good faith.

5. Contravention of the Code

The NLC regards any contravention of the Code as a serious matter. At the same time, any suspected or illegal contravention under investigation is treated with the utmost confidentiality. Contravention of the Code may result in disciplinary action, including the termination of employment. Certain breaches of the Code could also result in civil or criminal proceedings.

