

ALTRON POLICY MANUAL



PART B – SECTION 2

CORPORATE COMPLIANCE POLICY

Compliance is not a
financial matter,
but a matter
of principle.

Prof A Schilder

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Definitions:

The following defined terms shall have the following meanings unless the context clearly indicates otherwise:

- “Altron” – Allied Electronics Corporation Limited;
 - “Altron Group” – Altron and its subsidiary and associate companies and/or entities;
 - “Board” - depending on the context, means the board of directors of Altron or the board of directors of a particular Company within the Altron Group, and “Boards” shall have a similar meaning;
 - “Company” – Altron and/or an individual Company within the Altron Group, and “Companies” shall have a similar meaning;
 - “Companies Act” – depending on the timing and/or context means the Companies Act 61 of 1973 or any amendments or Acts which replace or substitute the Companies Act;
 - “Competition Act” – the Competition Act, No. 89 of 1998, as amended;
 - “Consumer Protection Act” – the Consumer Protection Act, No. 68 of 2008, as amended;
 - “the Corruption Act” – the Prevention and Combating of Corrupt Activities Act, No. 12 of 2004, as amended;
 - “the National Credit Act” – the National Credit Act, No. 34 of 2005, as amended;
- and

- “Taxation Legislation” – the various tax legislation applicable at any point in time, including but not limited to the Income Tax Act, 58 of 1962, as amended and the Value-Added Tax Act, 89 of 1991, as amended.

Introduction:

Why be concerned about corporate compliance?

Altron is esteemed as a company and as a group of companies with distinct strengths. While this reputation is the result of many years’ work, the careless, improper actions of just one employee can damage the Altron Group’s image and reputation in the blink of an eye. We must prevent this. To do so requires that all employees be guided in their activities by reasoned principles, particularly those set forth in this Corporate Compliance Policy. **Remember that the way each employee conducts the company’s business can affect the Altron Group’s public image and reputation.**

Corporate compliance refers to the lawful, responsible and proper conduct of the Altron Group’s businesses. Each employee is obligated to obey all applicable laws and corporate guidelines in his or her work for the Altron Group.

This Corporate Compliance Policy serves as the basis for this. It does not, however, cover all conceivable situations or describe

Unlawful and unethical behaviour can have far-reaching consequences for the Altron Group, including:

- criminal penalties
- administrative fines
- civil damages
- seizure of profits
- exclusion from contracts
- termination of business relationships
- harm to our image and reputation
- negative perceptions by the investor community

Individual employees who breach the principles of this Corporate Compliance Policy also face serious consequences, such as fines or imprisonment, claims for damages, sanctions under labour law and possible termination of employment.

Employees who disobey the rules cannot claim to have been acting in the Altron Group’s interests, because **any compliance violation ultimately harms the Company for which they work, as well as the Altron Group.** In view of the possible

all of the particular rules that must be followed. Furthermore, the law in some countries may prescribe stricter standards than those set forth here, in which case the stricter standards govern.

The Altron Group desires to succeed in the competitive arena by being innovative, quality-driven, reliable and fair. If the only way to close a deal is by acting in a way that is illegal or unethical, we will forego the deal. An employee who declines business in such circumstances will never suffer retaliation as a result.

The Altron Group is continuously in the public eye. By systematically implementing this Corporate Compliance Policy, we show the media, our investors, competitors, the authorities and our business partners that compliance is an integral part of our corporate culture.

Altron is a globally active group of companies. Our employees, therefore, are exposed to a wide variety of norms and ethical principles, some of which are often unfamiliar to them. What at first sight appears to be a purely local matter may also be subject to the laws of a foreign jurisdiction. This Corporate Compliance Policy is intended to provide employees with a point of reference in their daily work and thereby help them avoid violations. By definition, its focus is limited to areas of particular practical significance. However, it should also encourage employees to

consequences, any advantage somebody purports to have gained in a specific situation can never, not even economically, be advantageous to the Altron Group as a whole.

For support, employees can turn to their managers or any of their Company's specialist departments, including the legal department, internal audit and the Altron Group secretariat. Employees should especially avail themselves of these resources when they are not clear about the applicable rules, or do not know how a specific situation should be handled, or when a high degree of risk is involved or the legal situation is unclear.

familiarise themselves with the rules that affect them and to seek counsel in case of doubt. Ignorance is no defence against the potential consequences of breaking the rules.

Our Principles of Business Conduct

1. We are committed to fair competition

- no anti-competitive behaviour

➤ The Altron Group is a firm supporter of the free market economy. Competition law is the free market's most important tool for ensuring fair, unrestricted competition.

Violations of the competition laws of the individual countries and regions in which the Altron Group does business can have dramatic consequences for the Altron Group. As mentioned in the introduction, we could face a variety of negative repercussions, including serious fines, lawsuits, exclusion from public contracts and harm to our reputation.

Employees who violate competition laws also face severe external repercussions, including possible imprisonment. Internally, the Altron Group will not show any leniency towards employees who disregard competition laws. Even if a business matter runs into difficulties through no fault of the employee,

- The South African Competition Act applies to all economic activity within, or having an effect within, the Republic of South Africa. Non-compliance with the Competition Act, apart from having serious reputational and governance implications, can give rise to severe financial and criminal sanctions. It is therefore imperative from a governance and risk management perspective that the Competition Act is complied with at all times.
- Aside from the formal requirements of the Competition Act with which all merger and/or acquisition activities, that meet the prescribed thresholds should comply with, the Competition Act specifically outlaws certain practices, namely restrictive horizontal practices, restrictive vertical practices, abuse of dominance and price discrimination by a dominant firm.

resorting to unlawful agreements with competitors is not acceptable. Compliance is the only permissible course of action, even in a crisis.

The Competition Act provides for administrative penalties of up to 10% of the annual turnover of a Company and fines of up to R500 000 or imprisonment of up to ten (10) years. In addition, it is anticipated that amendments to the Competition Act will soon take effect, in terms of which the criminal prosecution of a director or a person having managerial authority within a Company will become possible under circumstances where the Company engaged in a prohibited practice and where such director or person participated in or knowingly acquiesced in the Company engaging in the said prohibited practice.

- The prescribed criminal sanctions could be a fine not exceeding R500 000 or imprisonment for a period of up to ten (10) years, or both such fine and imprisonment.
- Adherence to the Competition Act is of critical importance. Each Company, its directors, officers and employees are therefore duty bound to ensure that the conduct of the Company takes place within the ambit of the Competition Act and that the Competition Act is not transgressed under any circumstances. No breach of this duty

- Having regard to the importance of fair competition, the Altron Group has put a specific Competition Policy in place. Such policy is to be read in conjunction with this Corporate Compliance Policy and is to be interpreted having regard to the broad principles and guidelines contained herein.

The Boards should regularly seek confirmation and assurance from management that the Competition Act is being complied with. Any non-compliance should be immediately reported to senior management (CEO of the relevant sub-holding Company, who in turn shall immediately report this to the Altron CE) and to the various risk management committees.

will be tolerated and the strongest possible action will be instituted against employees where unlawful conduct is found to exist.

2. We are committed to integrity in business dealings

- no bribery or corruption

➤ The Altron Group will not tolerate bribery or corruption.

Corruption is immoral and is contrary to fair competition and harms a company's economic standing and reputation. In addition, many countries treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country, for example both the South African Prevention and Combating of Corrupt Activities Act, 12 of 2004, and the UK Bribery Act of 2010 apply extra-territorial, in other words to activities of locally based companies or individuals in other countries.

The Altron Group rejects any form of bribery and corruption and will take the strongest possible action against employees when any conduct amounting to bribery and/or corruption is found to have occurred. In this regard the Altron Group aligns itself fully with the fight against bribery and corruption, including but not limited to the Corruption Act, and any other similar legislation that deals with crimes involving dishonesty in any form.

Policy and is to be interpreted having regard to the broad principles and guidelines contained herein.

Thus, Altron Group employees are strictly prohibited from attempting to **unlawfully** influence business partners, whether through favours, gifts or the granting of other advantages, anywhere in the world. This rule particularly applies to dealing with individuals acting on behalf of government agencies or other public institutions.

The Altron Group will not entertain any business deals that involve breaking the law or violating Company rules relating to the granting or acceptance of favours, mindful of the fact that some business may be lost as a result. No amount of potential additional revenue or earnings can justify illegal business practices. This applies without exception throughout the Altron Group. No employee, regardless of the country in which he or she works, is entitled to violate the law or Company policy.

Furthermore the Altron Group has introduced a Corporate Gift and Entertainment Policy which has been published and which is applicable to the entire Altron Group. Such Corporate Gift and Entertainment Policy is to be read in conjunction with this Corporate Compliance

Any gift, even those given indirectly (for example to friends, relatives or associations), is considered an **advantage**. Examples include without limitation, cash, invitations to events, airline tickets, hotel stays, employment for friends or relatives, special personal favours and even the provision of expensive food and drink.

The granting or acceptance of gifts must take place in compliance with the law as well as Altron's Corporate Gift and Entertainment Policy. If stricter rules and law exist, then the stricter standard must be observed.

Altron Group employees are not allowed, under any circumstances, to demand personal gifts. Likewise, they may not offer or grant gifts of cash, or gifts equivalent to cash, to any public official.

In dealings with business partners, employees must avoid granting or accepting any gifts in connection with the negotiation, award or performance of a contract, and any gift granted or accepted must be of a size deemed unobjectionable

under the laws applicable to both the giver and the recipient. In case of doubt, please contact the Altron legal department or the Altron Group secretariat.

3. We are committed to the principle of sustainability

- no inappropriate risks for human health and the environment

➤ The Altron Group is well aware of the goal to protect the environment and the health and safety of everyone who comes into contact with our products. This is extremely important to the way we conduct business.

The Altron Group develops and markets products and services to a diverse range of industries and sectors. In keeping with this work, the Altron Group acknowledges its duty to help meet the economic, ecological and social needs of present and future generations. In other words, we are committed to sustainable development.

3.1 Product stewardship

Ensuring the proper use of our products requires monitoring them over their entire product life cycles. Addressing potential risks responsibly is particularly important. Once a potential risk related to the handling of one of our products is identified, the

The purchaser of the product must be advised of risks associated with its use, and every product must to the extent that it is practical and applicable, bear the appropriate warning labels.

An essential component in the development of any product or new technology is assessing the potential risks and benefits of the product or new technology.

All laws and regulations must also be observed when handling hazardous materials. Prohibited materials may not be manufactured or brought onto Company premises.

3.2 Environmental protection

We believe in making an important contribution to sustainable development through the efficient use of resources. Reducing the consumption of energy and raw materials in production and thereby limiting discharge requires exhausting all reasonable opportunities for process optimisation.

appropriate persons within the Company are to be notified immediately, even if the risk arises only in conjunction with a third party's product.

3.3 Plant safety

Industrial plants and installations require careful planning and regular, systematic inspection and servicing in order to prevent malfunctions, accidents, spillages, and major hazards.

Employees who work in our plants must be thoroughly trained, be given detailed working instructions and be properly supervised.

3.4 Occupational health and safety

Maintaining the health and wellbeing of our employees is in everyone's – the employees' and the Altron Group's – best interests. Line management receives support in preventing accidents and illness from specialists in occupational medicine and safety who strive to maintain and improve safety and health.

Occupational health and safety regulations help to ensure this. Employees share in the responsibility for occupational safety in the workplace. Sometimes accidents occur because we become less careful.

Extreme care must be exercised when dealing with potential sources of danger. Every employee is called upon to strictly

When an incident occurs, the responsible managers and safety representatives must immediately notify those divisions of the Company responsible for health, safety and environmental protection.

and constantly observe all safety rules in his or her respective workplace: for his or her personal benefit, and for the benefit of colleagues and the Altron Group as a whole.

4. We are committed to safeguarding equal opportunity in securities trading - no illegal insider trading

➤ Every Altron Group employee is required by law to maintain secrecy with respect to any inside, non-public, price sensitive information about the Altron Group that could affect the Altron Group's share prices.

Using such inside information for personal gain or the gain of others is prohibited. Common examples of inside information include without limitation, knowledge about the intended disposal of parts of the Altron Group, the acquisition of outside companies, the formation of joint ventures, new findings regarding key products, or specific information about business developments which have not yet been made public.

Insider trading laws prohibit dealing in securities on the basis of non-public, price sensitive information or the sharing of such information with third parties. In other words, insiders may not divulge non-public price sensitive information to third parties, whether inside or outside of the Altron Group, except on a strict need-to-know basis and with reasonable measures in place to ensure that the information remains confidential and cannot be misappropriated by third parties.

Employees are referred to Altron's Code of Conduct and Disclosure Policy which provide guidance regarding insider trading and dealing in the Altron Group's securities. If there exists any doubt in this regard,

employees should first consult with the Altron Group secretariat.

5. We are committed to proper record-keeping and transparent financial reporting - no deception

- An internal control system must provide for the proper documentation of an entity's key business processes and the establishment of controls to ensure that all transaction details relevant for accounting purposes are fully and correctly captured.

The Altron Group recognises that good corporate governance requires inter alia that business records are properly and securely stored and controlled in terms of a comprehensive policy. In this regard, Altron has introduced and accepted a Master Records Management Policy which is applicable to all Companies within the Altron Group, and in terms of which formal procedures and guidelines are laid down for the proper and lawful management, retention and destruction of business records, including binding agreements, in accordance with applicable legislation and other requirements.

Altron Group Companies should at all times

Files must therefore be complete, orderly and readily understandable. Employees should retain records for as long as statutory or internal provisions require, and must never destroy documents relevant to threatened or pending official or judicial proceedings.

Any item of correspondence, whether a letter, fax, e-mail or even verbal comment, must be communicated in observance of proper etiquette and be clear and consistent in content so that it can be presented or surrendered to a third party (such as an investigative body, court of law, other governmental institutions or certified public accountants).

Comments attributable to the Altron Group that are inappropriate, unclear, incomplete or made in haste may be extremely damaging because they can be misinterpreted, misused or taken out of context. Employees must be courteous and efficient when using e-mail and other forms of online communication. The volume of e-mails should be kept to the necessary minimum.

ensure compliance with the Master Records Management Policy.

The following guidelines are essential for ensuring accurate and timely financial reporting:

All items with accounting records and related documents must fully and accurately reflect all business transactions and give a true and fair view of the Companies and the Altron Group's assets.

Every employee tasked with presenting information that is relevant to the Altron Group's financial reporting and destined for public disclosure is responsible for ensuring that this information is complete and accurate.

Employees must promptly notify their managers or the relevant holding or sub-holding financial director if ever they have reason to doubt whether material business transactions have been correctly presented in the financial reporting.

Altron provides its shareholders, financial analysts; the investor community, media outlets and the general public with regular, timely reports on the Altron Group's financial situation and material changes in its business so as to maintain the greatest possible degree of transparency. Altron's

Altron Group's financial position, results of operations and cash flows. The annual financial statements are published and circulated within 90 days of the end of the fiscal year.

The Altron Group also makes use of the Internet as a medium to provide interested parties with the latest corporate information. The Altron website includes a financial calendar with important publication and event dates, including dates for the annual report, interim report and the annual general meeting.

In the interests of fair disclosure, Altron treats all of its shareholders and major target audiences the same when it comes to the provision of information and announces any important changes without delay. Shareholders are also given timely access to information that Altron publishes outside of the RSA in compliance with applicable foreign capital market regulations.

For further information and guidance in this regard, employees are referred to the Altron Disclosure Policy.

reporting follows the guidelines specified in the Companies Act, the JSE Listings Requirements and International Financial Reporting Standards, informing shareholders twice per annum about the

6. We are committed to fair and respectful working conditions - no discrimination

➤ No person is to be unfairly treated, disadvantaged, favoured, harassed or ostracized because of race or ethnicity, colour, nationality, religion, ideology, gender, age, physical characteristics, appearance or sexual orientation.

Everyone has the right to be protected against discrimination and harassment of any kind whether within the Altron Group or in contacts with outside parties.

The Altron Group expects its employees to be friendly, objective, fair and respectful in their dealings with colleagues and third parties, including customers, suppliers and officials. By doing so, they also make an active contribution towards protecting Altron's good name and reputation.

The responsibility for maintaining these standards of conduct rests with each and every employee, not just with managers. A violation of these standards will not be tolerated. Any conflicts should be referred to the employee's manager, the human resources department or the relevant legal department, which, if necessary, will take the required action to appropriately address any wrongdoing and to prevent a repeat violation.

7. We are committed to protecting the fruits of our own endeavours and respecting the legally recognised rights of others
- no infringement of our own or other's intellectual property rights

➤ The results of our scientific research and technical development work are extremely valuable business assets.

Inventions, patents and other intellectual property (including without limitation, information that is confidential to the Company such as methodologies, concepts, formulae, special processes, the unique way of doing business, manufacturing processes, trade secrets and know how, which are not part of the public domain) are the “reward” for our endeavours and expenditures in the areas of research and development. They are extremely important to the Altron Group's future, as are our trademarks and brands, the value of which may in some cases be substantial and the result of decades of effort and marketing expenditure. We must therefore take utmost care to ensure that our rights in the intellectual property we create enjoy full legal protection.

No employee may create or dispose of Altron Group intellectual property (for example: patents, marks, particularly trademarks, utility models and designs, or copyright) or execute an agreement or otherwise exercise discretionary authority over such property without the express written consent of the Altron Group secretariat and legal department.

Care should be taken to avoid any unintentional transfer of intellectual property through the negligent handling of company information in public, such as working with laptop computers in full view of others or making casual comments in public or in presentations. Business data must be protected against unauthorised access by third parties. No employee may make copies of business papers or data files other than for work-related purposes.

Employees must respect the valid, legally recognised intellectual property rights of third parties and may not use them without

permission.

Trade secrets and new knowledge should not be passed on to third parties, much less made public, without the proper legal protection. The same care must be taken with information shared over Alix, the Altron Group's intranet.

8. We are committed to keeping corporate and personal interests separate - no conflicts of interest

➤ All employees must separate their own personal interests from those of the Altron Group.

During working hours, in particular, employees have a primary duty to promote the Altron Group's corporate interests. Conflicts of interest – or even the mere appearance of such conflicts – must be avoided. A list of typical areas of conflict is provided below. Where a conflict appears likely, employees should seek assistance from their manager.

- Personal interests: A person's own individual interests or relationships must not influence business decisions of the Altron Group.
- Business relationships with third parties: Business relationships with third parties must be formed on the basis of objective criteria (for example, price, quality, reliability, technological standard, product suitability, existence of a long-standing and trouble-free business relationship).

The execution of a contract or continuation or termination of a business relationship with a third party must not be influenced by personal relationships, personal interests or tangible or intangible personal advantages. The supply of products or provision of services to the Altron Group by companies that are controlled by Altron Group employees or their close relatives must be subject to close scrutiny.

- Contracting of suppliers or other business partners of the Altron Group for personal purposes: If an employee wishes to place a personal supply or other business contract with a person or entity that also has a pre-existing business relationship with the Altron Group and that employee is in a position to directly or indirectly influence the Altron Group's business relationship with the supplier or business partner in question, the employee must notify his or her manager in advance and receive the manager's written permission before placing the contract.
- Using the services of the Altron Group employees for personal purposes: Managers may not abuse their authority

by availing themselves of the services of Altron Group employees for personal purposes.

- Use of Altron Group property (for example, equipment, goods, vehicles, office supplies, documents, files, data storage media): Employees may not use items belonging to the Altron Group for their own personal purposes or remove such items from the Company premises without their manager's express consent. Likewise, no data, programs or Company papers may be copied or removed from the Company's premises without prior approval.
- Use of the internet and e-mail system: The Altron Group provides Internet access and electronic communications for business purposes. The occasional, only marginal use of the business Internet connection for private purposes during individual lunch or tea breaks is permitted. This permission may be revoked at any time. Private Internet use must be strictly limited in duration and must not interfere with an employee's duties. Private use of the Internet is subject to the provisions of the Altron Group End User Policy. The e-mail system provided by the Altron Group is predominantly for business purposes and this should be respected by employees.
- Outside employment: Any employee intending to accept employment with an outside company – even on a freelance basis – or to set up his or her own business must inform his or her manager and receive their prior consent thereto in writing. This applies particularly to positions with companies that already do business or compete with the Altron Group or might reasonably do so.
- Personal involvement in political parties or other social or political institutions: The Altron Group welcomes its employees' voluntary involvement in such organisations as long as it does not interfere with the performance of their duties for the Altron Group and provided such employees do not publically associate their political preference with the Altron Group. Employees are referred to Altron's Code of Conduct dealing with political party contributions.
- Public expression of personal opinions by employees: When expressing their personal opinions in public, employees must not give the impression that these opinions represent the views of the Altron Group.

9. We are committed to co-operating with the authorities - no misinformation

➤ The Altron Group endeavours to be co-operative in its dealings with all authorities and government agencies while at the same time defending its own interests and rights.

All employees responsible for collecting company information and communicating it to the Stock Exchange News Service, to other regulatory authorities or for other public announcements should communicate such information completely, openly, correctly, timeously and understandably.

The responsible legal department and the Altron Group secretariat must be notified immediately when employees are contacted by any authority, such as the police or public prosecutor's office, whose job it is to investigate possible legal violations or prosecute violators. In particular, information or documents should be provided only after consulting and with the assistance of the responsible legal department and the Altron Group secretariat.

10. We are committed to complying with laws, regulations, rules and standards

- no breach of applicable laws, regulations, rules and standards

➤ Compliance with applicable laws, regulations, rules and standards is critical from a risk management and governance perspective.

- There exists a plethora of laws, regulations and rules applicable to Companies and the businesses conducted by them. In addition, there may be industry standards and rules which specific Companies may decide to apply on a voluntary (non-binding) basis.
- Compliance with applicable laws, regulations, rules and standards is critical from a risk management and governance perspective. Failure to comply therewith creates potentially material risks, for example the financial penalties applicable for non-compliance with the Companies Act, the Competition Act, the Consumer Protection Act, environmental legislation, health and safety legislation, the National Credit Act and Taxation Legislation. In addition, non-compliance indicates poor governance and has reputational implications.

The Board should at all times be aware of the laws, regulations, rules and standards that specifically apply to the Company and its businesses and should be aware of any changes that may take place therein.

In addition, the Board should ensure that the Company complies with laws, regulations, rules and standards by implementing an effective compliance framework and processes. The Altron Group Legal Department and the Altron Group Secretariat have an important role to play in this regard.

- Various policies exist within the Altron Group requiring compliance with the applicable legislation. The various company secretarial, financial, internal audit, legal and tax functions assist Companies in ensuring that legislation is complied with at all times through a process of self-education, as well as educating other members of management and staff regarding legislative requirements, and through internal checks and audits.

- In addition, compliance reports are issued on a regular and on-going basis to the Boards of the various companies within the Altron Group and the various Board committees, such as the audit and risk management committees.

How does this policy affect each individual's daily work routine?

- All employees must adhere to this Corporate Compliance Policy. It is intended to protect both the Altron Group and its employees.

This policy defines the framework within which the Altron Group's employees can act with confidence and directly benefits them by, among other things, safeguarding the employees from discrimination and establishing rules for occupational safety. Its observance therefore is in the best interest of employees both as individuals and as important contributors to the Altron Group's success as a whole – success from which employees benefit.

Altron's approach towards this policy is to provide a framework of broad principles and guidelines rather than a set of hard and fast rules.

Altron believes that it is not possible to provide a set of rules that will cover every possible scenario and it therefore accepts that it is preferable to rather provide principles and guidelines against which conduct can be tested. This also provides flexibility for adaptation and adjustment as and when circumstances and practices change from time to time. This policy should therefore be interpreted and understood as a set of principles and guidelines against which conduct is to be measured.

Altron has various policies which deal with several aspects of corporate, business and employee behaviour and these policies are applicable to all Companies, businesses and employees within the Altron Group.

As such, this policy does not replace any existing policy/ies but is rather to be treated as a high level policy dealing with responsible corporate behaviour as it provides the background and framework against which all conduct in the Altron Group and all existing policies should be measured and interpreted.

Every employee is called upon to review his or own behaviour in light of the standards set forth in this Corporate Compliance Policy and to ensure that these standards are observed.

Employees should bear in mind that there are specific laws and specific internal policies that address in greater detail the topics discussed here.

Employees are required to familiarise themselves with the applicable laws and these internal policies governing their areas of responsibility and to follow these laws, rules and guidelines in their daily work. Any ambiguities should be clarified. The Altron Group provides its employees with access to all the necessary information resources and counsel to prevent infringements of the law or company regulations. The provisions of this Corporate Compliance Policy, read in conjunction with the other Altron Group policies, take precedence over any conflicting instructions given by any manager.

In addition to support from managers, there are information resources (such as the Altron Policy Manual) accessible via Alix, and advice is available from the specialist departments such as the legal department, internal audit and the Altron Group secretariat.

Every manager must organise his or her area of responsibility so as to ensure adherence to this Corporate Compliance Policy and applicable law.

In particular, managers must communicate the rules applicable in their areas of responsibility, monitor adherence to them and enforce them. Problems must be actively addressed and resolved.

Each manager is expected to set an example for his or her area of responsibility by acting with integrity and thereby ensure that compliance is internalised as a fundamental part of our corporate culture.

All employees are required to immediately report any breaches of the Corporate Compliance Policy.

Breaches of this Corporate Compliance Policy should be reported to the relevant legal department, internal audit or the Altron Group secretariat immediately. Employees may also avail themselves of the Deloitte Tip-Offs anonymous hotline: tim@tip-offs.com.

When employees suspect bribery, corruption or the intentional mishandling of Company property or finances, for example embezzlement, fraud, breach of trust or the offering or acceptance of bribes, they should report the matter to the Deloitte Tip-Offs anonymous hotline without delay.

Promptly reporting this kind of information is likely to save the Altron Group from suffering additional, more serious harm or at least mitigate the damage.

For this reason employees should direct this kind of information to the individuals and departments mentioned above, because they are most capable of taking the necessary legal steps.

No employee will be discriminated against because he or she acting in good faith, reports a possible breach of compliance. When the reporting employee is himself/herself involved in a breach of this Corporate Compliance Policy, the Altron Group, in determining any action to be taken against that employee, will consider whether or not the report and any timely assistance given in investigating the possible breach helped avert further damage to the Altron Group.

The viability and effectiveness of this Corporate Compliance Policy will be regularly reviewed. Constant monitoring along with frequent evaluation and reporting are designed to ensure its continual improvement.

The Boards, and insofar as applicable the audit committees and risk management committees established by the Boards, must regularly, at least once per annum, as a formal agenda item discuss and review this policy and the compliance therewith. In this regard formal reports should be submitted by such departments and/or individuals responsible for implementation of this policy.

The Boards may task such person or persons, who need not necessarily be Board members, to take responsibility for the implementation of, compliance with and reporting on this policy.

The Altron Board is required to review and if necessary to amend this policy on an ongoing basis in reaction to or in anticipation of changed requirements or circumstances.

Anonymous Compliance Hotline for
Employees:

Tip-Off Tim

Free Call: 0800 205 352

Free Fax: 08200 00 77 88

Free Post: KZN 138 Umhlanga Rocks 4320

SMS: 32840

e-mail: tim@tip-offs.com

Corporate Compliance on the Intranet:

<http://Alix.altron.com>

Corporate Compliance on the Internet:

www.altron.com

Scope of Validity

This Corporate Compliance Policy applies to
all employees of the Altron Group throughout
the world.