



HEWETT WEALTH (PTY) LTD  
FSP 46645

Title	Code of Conduct
Version	10022016
Approval	Board Meeting – 4 April 2016
Effective Date:	4 April 2016
Revised Date:	Not applicable

## Code of Conduct

### Scope

It is the duty of all employees to adhere to this code of conduct, to exercise due care and skill in their work, and to avoid conflicts of interest with their employer and clients.

It is the general duty of Hewett Wealth to consider the best interests of its stakeholders, and to exercise due care and skill in strategic decision making.

### Purpose

The purpose of this Code of Conduct is to provide a practical guide to decision making and to provide guidance in terms of expected behaviour to Hewett Wealth and its employees.

### Background

The company has developed and implemented internal policies and procedures to guide, conduct and enforce compliance to minimum standards. These standards are designed to be in accordance with South African legislation, regulations and industry practices.

Practical decision-making, however, often requires the balancing of competing interests, particularly when dealing with unforeseen circumstances. This means we need to balance the interests of our key stakeholders when making decisions in accordance with our values.

In the event of uncertainty as to the most appropriate course of action, it is recommended that guidance should be obtained from senior management.

### Code of Conduct

Hewett Wealth and its employees will endeavour to at all times

- Maintain executive accountability for decision making on material matters
- Conduct business honestly, fairly and responsibly
- Constantly strive to improve the quality of our products and services
- Protect the confidentiality of information in accordance with the law and prescribed practices
- Communicate and act in an open, clear, timely, honest and transparent manner

- Endeavour to always treat our clients fairly
- Provide a healthy and safe working environment
- Always conduct ourselves in a professional and courteous manner
- Behave in a way that will result in us conducting ourselves with dignity, integrity and credibility, whether acting in a professional or personal capacity
- Conduct our business in an ethical and professional manner
- Build long term relationships based on honesty and fairness
- Afford suppliers of goods, services and capital fair opportunity to compete for our business on the grounds of capability, competitive pricing, quality and service.
- Recognise and discharge our responsibility to uphold all laws and regulations

#### **Consequences of Non-Adherence**

All employees are expected to be familiar with their role and duties and Hewett Wealth's internal policies and procedures, as failure to comply with them may be considered to be misconduct and employees may be subject to disciplinary action that could lead to dismissal.

Furthermore, note that the Code of Conduct is not intended to comprise an exhaustive list of what constitutes ethical and acceptable conduct, nor is it intended to contain a comprehensive list of offences or contraventions on which Hewett Wealth will take appropriate legal action.

#### **Training and Awareness**

All employees will receive be given access to this policy on employment.

In the event of uncertainty as to the most appropriate course of action, it is recommended that guidance should be obtained from senior management.

#### **Review**

This policy will be reviewed as and when required, but on an at least annual basis.