

EQSTRA BUSINESS ETHICS POLICY

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1. INTRODUCTION

The ethical performance of an organization is the total of the ethical performance of everyone who works for it. Thus, all Eqstra Corporation (Pty) Ltd (Eqstra) employees owe our employer a duty of honesty, diligence and integrity.

The code of ethics applies to employees, non-executive directors, as well as contractors, consultants and others who may be temporarily assigned to perform work or services for Eqstra. The Code of Ethics will be made available in hard copy to non-pc-based employees and on Beat (intranet).

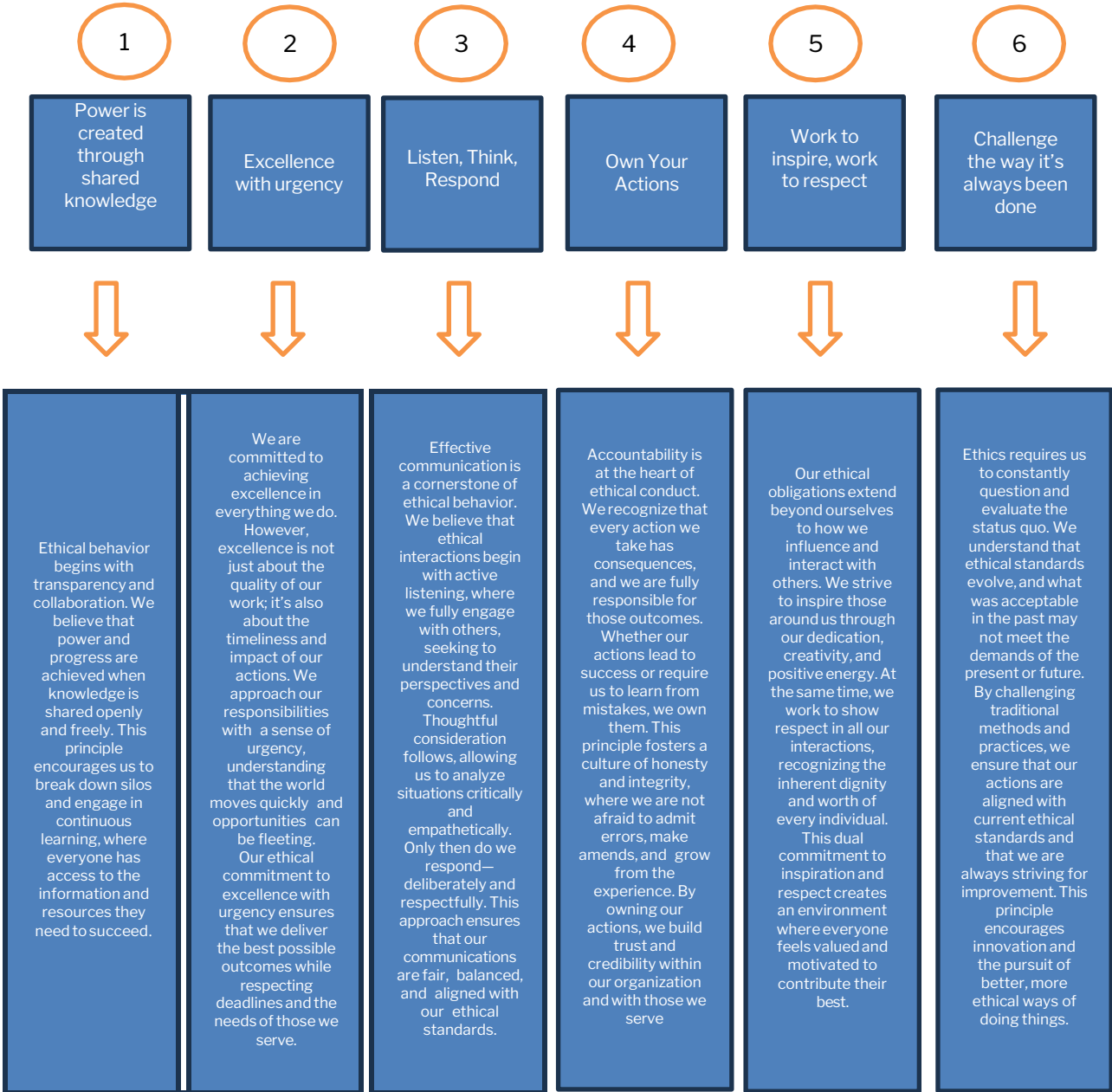
Ethics refers to standards of conduct, which indicate how individually and collectively an organisation should behave based on moral duties and virtues arising from principles about right and wrong. It defines our values in greater detail and provides ethical guidance on how we do business, make decisions, interact with and protect the interests of our stakeholders.

2. VALUES

At Eqstra ethics form the foundation upon which trust, respect, and success are built. Our ethical framework is rooted in six core values that guide our behavior, decision-making, and interactions. These values ensure that we operate with integrity, foster a positive environment, and continuously strive for excellence.

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These six values form the ethical backbone of our organization. They guide our daily interactions, inform our decision-making, and shape our culture. By adhering to these principles, we not only ensure our own integrity but also contribute to a work environment that is fair, respectful, and dedicated to continuous improvement. Through our commitment to these values, we aim to inspire trust, foster collaboration, and achieve excellence in all that we do.

3. POLICY

- Compliance with Eqstra’s policy on ethical business conduct and behaviour is required of all employees, contract labour, consultants, temporary employees, part-time employees, casual employees, occasional employees and others acting for Eqstra must also comply with this policy.
- Eqstra is committed to competing honestly and fairly and we support and comply with all antitrust and fair competition laws in all markets where we do business. Antitrust and fair competition laws vary by country, but all are designed to stop competitors from creating agreements that prevent, restrict or distort the exercise of free competition
- Eqstra does not allow conflict of interest practices where an employee has a personal interest that could be seen to have the potential to interfere with his/her objectivity in performing his/her duties or exercising his/her judgement on behalf of Eqstra. Any such personal interest on the part of an employee, or a member of his/her family, is not permitted unless approved in writing.
- Eqstra respects and values the cultural diversity of its customers and employees. Eqstra also respects its employees’ personal privacy, but it does expect them to be law-abiding and to conduct their personal affairs like good and responsible citizens, especially where any indiscreet or antisocial behaviour could affect the individual’s performance or reflect badly on Eqstra.

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4. REPORTING NON-COMPLIANCE AND MONITORING

4.1 Reporting non-compliance

Employees should report / disclose any actions or activities in contravention with this policy directly to management or alternatively disclosures may be executed through the Tip-Offs

Anonymous on:

Botswana: 0800 600 644(BTC), 1144 (Orange), 71119602 (Mascom)

Eswatini: 8007006

Namibia: 0800 000 909 or 91847

South Africa: 0800 000 909

You may also send an email to nedbankgroup@tip-offs.com anonymity of complaints will be protected.

4.2 Monitoring

Eqstra monitors ethical performance regularly in order to ensure that corrupt or unethical business practices are eliminated.

The Board of Directors will monitor the Company's activities in light of:

- relevant legislation, other legal requirements and codes of best practice relating to social and economic development, good corporate citizenship, the environment, the health and public safety, consumer relationships, labour and employment
- We encourage you to discuss situations that potentially or actually violate any applicable law, regulation or policy, with your CEO or if your CEO is involved in the

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situation or you are uncomfortable speaking with your CEO then contact the Chairperson of the Board of Directors.

- If you have a good-faith concern regarding conduct that you believe to be a violation of a law or regulation, Company policy, or you reasonably believe you are aware of questionable financial or accounting matters follow the above suggested reporting lines.
- If you have knowledge of a potential violation and fail to report it via the process set forth above, you may be subject to disciplinary action, up to and including termination of employment.
- Eqstra will not retaliate and will not permit any retaliation against any individual for filing a good-faith concern to management nor for participating in the investigation of any such complaint.

5. BUSINESS CONDUCT AND ETHICS GUIDELINE

The extended ethical and behavioral framework by which we operate is outlined in the **Business Conduct and Ethics Guideline** and it is expected that all employees should sign the acknowledgement thereof. It defines how we should conduct ourselves with integrity, both as team members and as decision makers. Accordingly, this guideline sets overall principles for practice to be adopted throughout Eqstra. Business Units within Eqstra are required to adopt these principles and processes to deal with specific ethical issues that arise in their specific circumstances.

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6. CONCLUSION

We recognise our obligations to all our stakeholders, i.e. shareholders, employees, customers, suppliers, competitors and the wider community.

It is up to all employees to ensure that Eqstra demonstrate uncompromising integrity and the highest ethical standards in business conduct every day. The CEO will champion the Business Ethics Policy.

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