



ELADA
INSTITUTE

BUSINESS ETHICAL CONDUCT POLICY

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1. BACKGROUND

The business conduct policy and guidelines aim to guide and support you in identifying, considering, understanding and appropriately responding to business ethics situations in the workplace. The summary covers Elada Institute's corporate policy and guidelines that will help you to respond ethically to common ethical issues.

1.1 Individual Choice and Ethics

Ethics is about how we should behave and what our conduct should be. It is also about how and why we should behave morally, honestly and appropriately. Therefore, ethical conduct and behaviour are based on:

- The ability to distinguish right from wrong
- The commitment to do what is right

2. POLICY PRINCIPLES

Elada Institute's Business Ethical Conduct Policy provides the following guidelines to all employees in all capacities, to serve as a basis which empowers them to ensure ethical conduct in their relationships with their colleagues and with all Elada Institute's business stakeholders with whom they do business on behalf of Elada Institute on a daily basis.

- Perform your duties with honesty, integrity and to the best of your ability. Do not allow anyone to be misled. Communicate openly and honestly, as well as demonstrate a sense of purpose and a commitment to achieving the best result, even under difficult circumstances.
- Treat people with fairness, courtesy and sensitivity with regard to their rights. Have respect for diversity.
- Accept responsibility for your actions and decisions.
- Behave in a way which is above reproach.
- Comply with all the rules, procedures and regulations that apply to Elada Institute, its systems and the way Elada Institute conducts its business.
- Use information obtained from Elada Institute only for the purpose for which it is intended.
- Treat the assets and property of Elada Institute, its employees, its customers and its suppliers with the same respect as your personal property. Do not waste Elada Institute's resources or time.

- Share and declare any information you may have about a personal or corporate conflict of interests. All declarations about such conflicts or potential conflicts must be made in writing.
- Refuse any gift that could be regarded as an attempt to exert undue influence over you.
- Challenge others if they are acting in an unethical way, report behaviour that is in conflict with this code and do not tolerate any form of retribution against those who speak up.

2.1 Ethical Business Conduct and Behaviour

Compliance with Elada Institute's policy on ethical business conduct and behaviour is required of all employees of Elada Institute and its subsidiaries. Contract labour, consultants, temporary employees, part-time employees, casual employees, occasional employees and others acting for Elada Institute must also comply with this policy.

Elada Institute conducts its business fairly, impartially and ethically. It is committed to respecting all laws as well as the provisions of the Constitution.

Employees may not engage in any activity that could raise questions as to Elada Institute's integrity, respect for diversity, impartiality or reputation. Ethical business conduct includes workplace relationships between employees in terms of our Constitution and requires respect for constitutional rights in employment, particularly with regard to human dignity, non-discrimination, and respect for diversity, impartiality and reputation.

Every employee has the right and responsibility to ask questions, seek guidance and express concerns regarding compliance with this policy or the implementation instructions concerning the guidelines. Employees' requests for help will be treated as strictly confidential.

2.2 Summary of Ethical Rights and Responsibilities

All employees are responsible for ensuring compliance with the standards of ethical business conduct set by Elada Institute and may request guidance or raise questions if they are concerned that the standards are not being adhered to.

2.3 Rights and Responsibilities of all Elada Institute Employees at all Levels

- Request information or guidance about ethical conduct.
- Familiarise yourself with Elada Institute's standards of ethical business conduct and always comply with them.
- Request, gain an understanding of, learn and comply with the details of the procedures and policies affecting your work. The particular level of knowledge needed will depend on the responsibilities involved in your work.
- Be aware of situations that could lead you or others to engage in illegal, improper or unethical actions and seek guidance to avoid potential problems.
- Question others who seem to be acting in an unethical way, and report conduct which is, or appears to be, in conflict with Elada Institute's Business Conduct Policy and Guidelines.
- Do not permit, submit to, or cause any form of victimisation, discrimination or retribution against those who are, or have been, or intend to be, ethically and morally responsible in protecting the interests of Elada Institute and other employees by reporting breaches of this policy.
- An employee who is, or becomes, aware of an existing or future contravention but takes no appropriate action to protect Elada Institute's interests and/or the interests of other employees may be held accountable in terms of the Disciplinary Code in this regard, as this inaction could prejudice Elada Institute and would not be ethically correct.
- Perform your duties with honesty and integrity, and to the best of your ability.
- Do not allow anyone to be misled.
- Communicate openly and honestly, and act with a commitment to achieve a prudent, fair, transparent and responsible result.
- Treat people with fairness, courtesy and sensitivity to their rights.
- Where applicable to your post, take responsibility and accept accountability for actions and decisions taken.
- The Disciplinary Code requires that employees comply with all the rules, regulations and agreements that regulate and apply to Elada Institute, its systems and the conduct of its business.

- In terms of the Disciplinary Code, employees are required to obtain appropriate authority for any public statement that may be interpreted as being an official comment of Elada Institute.

2.4 Responsibilities of Elada Institute Managers

Apart from their general responsibilities as employees of Elada Institute, managers and, where applicable, supervisors will have additional responsibilities resulting from their seniority and the nature of their managerial and supervisory duties.

- Make a personal commitment to act in accordance with our standards of ethical business conduct. Communicate this commitment to your employees and lead by example.
- Maintain a work environment that encourages open communication regarding business ethics issues and concerns, and that promotes compliance with such ethics.
- Periodically discuss business ethics issues at work and review standards of conduct with your employees during working hours, for example at team briefings and forums.
- Ensure that appropriate ethics sensitisation and training are provided.
- Familiarise yourself with the resources and processes available to assist in the resolution of questions and concerns about business ethics.
- Identify areas of risk in your business activities and establish ways to address potential contraventions of the code of conduct.
- Take responsibility for the conduct of your staff and make sure that any misconduct that is so serious, recurrent or widespread that action should already have been taken to prevent it, is dealt with appropriately. This includes identifying and addressing those activities which may involve ethical issues covered by a specific policy.
- Ensure that Elada Institute's business conduct policy and guidelines are communicated clearly and that copies of this Policy are available to all staff members. The Policy should be included in the sign-on documentation for new employees.

- Do not delegate discretionary authority to subordinates who are unaware of, or who have demonstrated insensitivity to the requirements of the Policy and Guidelines.

2.5 Resolving Ethical Problems Step by Step

Analyse the situation:

- How did the situation occur?
- What must be decided?
- Who can make the decision - you or someone else?
- What would the implications of the decision be?
- What written instructions should be consulted?
- Does an existing procedure or policy throw light on the situation?
- Who should be consulted?
- What are the ethical alternatives and rationale for each?

If any of the choices requires that an ethical principle be compromised, evaluate the facts and assumptions carefully. Is there room for a compromise that would not violate Elada Institute's standards of integrity? Finally, would another employee agree with your ethical judgment?

Consider the possible outcomes

- Which outcome would be better from an ethical point of view?
- Who could be hurt and/or who could be helped by the decision?
- To what extent could the persons affected be hurt? How might they be helped? What alternatives would be ethically permissible?
- Of the choices identified, which do the most to reduce harm? which do the most to provide help; which are most aligned with Elada Institute's corporate values; and which most strongly preserve the rights of those involved?

Ask the following questions

- Would I be proud to tell my family about my actions or have them made public?
- If I were on the other side of the table, would I consider these to be fair?
- Would my actions be viewed as proper by my peers?
- Will my decision still seem correct a year from now; five years from now; ten years from now?
- Will my decision involve the contravention of a law, procedure or guideline?

Compliance and verification

Strict adherence to the provisions of this Code is a condition of employment with the Group. We aim to create the climate and opportunity for our employees to voice genuine concerns about behaviours or decisions that they perceive to be unethical. The CEO is responsible for initiating and supervising the investigation of all reports of breaches of this Code and ensuring that appropriate disciplinary action is taken when required. The Group's auditors may be asked to report on any practice uncovered, in the course of their work, which appears to breach this Code.

3. POLICY LIFE CYCLE

Policies are reviewed as and when required.

4. REFERENCES

- [Elada Institute Business Ethical Conduct Policy](#)