

EPSIDON TECHNOLOGY HOLDINGS (PTY) LTD AND ALL OF ITS AFFILIATES

(“EPSIDON TECHNOLOGY HOLDINGS (PTY) LTD”)

Legal Division

Revision 2 | Enhancement

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This document (including but not limited to manuals, policies, procedures, forms referenced or included herein) applies to all Affiliated Companies of Epsidon Technology Holdings (PTY) LTD.

“Affiliated Company(ies)” means, in relation to Epsidon Technology Holdings (PTY) LTD (“Epsidon Technology Holdings (PTY) LTD”), a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries. Including but not limited to:

- Epsidon Technology Distribution (Pty) Ltd t/a First Distribution
- Even Flow Distribution (Pty) Ltd
- The Linux Warehouse (Pty) Ltd
- Epsidon Management and Marketing Consultancy (Pty) Ltd
- First Device Management Technology (Pty) Ltd
- Nology (Pty) Ltd
- Cloud Brokerage Services (Pty) Ltd

* This list is subject to amendment at the sole discretion of the Epsidon Technology Holdings (PTY) LTD and will include all affiliates whether listed or not.

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NOTICE

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Copyright in the whole and every part of this document belongs to Epsidon Technology Holdings (PTY) LTD (the "Owner") and it may not be used, sold, transferred, copied or reproduced in whole or in part in any manner or form or in or on any media to any person other than in accordance with the terms of this Code of Conduct or otherwise without the prior written consent of the Owner.

1. POLICY BRIEF AND PURPOSE

- 1.1. This Code outlines the Company's expectations regarding employees' behaviour towards their colleagues, supervisors, and Epsidon Technology Holdings (PTY) LTD.
- 1.2. Epsidon Technology Holdings (PTY) LTD including all its Affiliates' ("Affiliate" means, in relation to Epsidon Technology Holdings (PTY) LTD(Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries) promote freedom of expression and open communication. Employees must refrain from behaviours that may lead to conflict, disruption, or disharmony within the workplace. It is expected that employees conduct themselves professionally and ethically, avoiding actions that could undermine the integrity or effectiveness of the organization. Furthermore, fostering a well-organized, respectful, and collaborative environment is fundamental to upholding Epsidon Technology Holdings (PTY) LTD' standards of excellence.
- 1.3. While this Code outlines specific guidelines for behaviour, it may not cover every possible scenario. Therefore, employees are expected to exercise good judgment and adhere to the principles of honesty, integrity, and professionalism in all aspects of their conduct within the workplace. Any actions or behaviours not explicitly addressed in this document may still be subject to disciplinary action if they undermine the integrity of the organization or violate legal or ethical standards. Employees are accountable for their actions and are expected to always uphold the values and standards of Epsidon Technology Holdings (PTY) LTD.

2. SCOPE

This Code is applicable to all employees within the organization, irrespective of their employment agreements or positions.

3. CODE REQUIREMENTS

- 3.1. Epsidon Technology Holdings (PTY) LTD employees are obligated by their contracts to adhere to the Code during the execution of their duties. The requirements of this Code are outlined below:

3.1.1. COMPLIANCE WITH LAW

- 3.1.1.1. Epsidon Technology Holdings (PTY) LTD employees must ensure their compliance with legal obligations. Employees are expected to demonstrate ethical and responsible

behaviour in all (not limited to) dealings related to the company's finances, products, partnerships, correspondence, and public reputation.

- 3.1.1.2. Epsidon Technology Holdings (PTY) LTD maintains a steadfast commitment to ethical business practices and compliance with all applicable laws and regulations. Employees are expected to conduct themselves with integrity and uphold the highest standards of ethical behaviour in all business dealings. Any actions that contravene legal requirements or ethical standards will not be tolerated and may result in disciplinary action, up to and including termination of employment.

3.1.2. RESPECT IN THE WORKPLACE

- 3.1.2.1. Employees are expected to always demonstrate respect towards their colleagues. Epsidon Technology Holdings (PTY) LTD maintains a zero-tolerance policy regarding discriminatory behaviour, harassment, or victimization.

3.1.3. PROTECTION OF COMPANY PROPERTY

- 3.1.3.1. All employees should treat company property, whether material or intangible, with respect and care.
- 3.1.3.2. Employees shall not misuse company equipment or use it frivolously.
- 3.1.3.3. Employees are expected to uphold the integrity of all intangible assets, such as trademarks, copyrights, and other proprietary materials. These resources should be utilized solely for the purpose of fulfilling job responsibilities.
- 3.1.3.4. Employees are required to safeguard company facilities and other tangible assets against damage and vandalism to the best of their ability.

3.1.4. PROFESSIONALISM

- 3.1.4.1. All employees must show integrity and professionalism in the workplace.
- 3.1.4.2. All Employees must follow the Dress Code Policy and maintain professional appearance whilst within the office environment and whilst attending any event in which the employee is a representative.
- 3.1.4.3. Epsidon Technology Holdings (PTY) LTD discourages its employees from engaging in unlawful activities and strictly prohibits bribery for the benefit of any external or

internal party. Upholding ethical conduct and compliance with legal standards in all business activities is paramount at Epsidon Technology Holdings (PTY) LTD. Any violations of this Code will result in disciplinary action, including termination of employment.

3.1.5. JOB DUTIES AND AUTHORITY

3.1.5.1. All employees should fulfil their job duties with integrity and respect toward customers, stakeholders and the community.

3.1.5.2. Epsidon Technology Holdings (PTY) LTD holds managers accountable for the responsible delegation of tasks, considering the skills and workload of their team members. Likewise, team members are expected to follow instructions from their managers and fulfil their duties with competence and efficiency. Maintaining these professional standards is essential for fostering a productive and respectful workplace environment. Any misuse of authority will be thoroughly investigated and met with appropriate disciplinary measures.

3.1.6. ABSENTEEISM AND TARDINESS

3.1.6.1. **ABSENTEEISM:** Epsidon Technology Holdings (PTY) LTD requires all employees to prioritize attendance and reliability to maintain a productive work environment. Absenteeism, defined as habitual or unauthorized absence from work without valid reasons, disrupts workflow, impacts team dynamics, and can compromise the organization's success. Absenteeism will be dealt with as per the Disciplinary Code.

3.1.6.2. **TARDINESS:** Epsidon Technology Holdings (PTY) LTD values punctuality and attendance as essential components of a productive work environment. Tardiness, defined as arriving late for work or scheduled meetings, disrupts workflow and can negatively impact team dynamics. Tardiness will be dealt with as per the Disciplinary Code.

3.1.7. COMMUNICATION

All employees are expected to be accessible and responsive to communication from colleagues, supervisors, or team members. Clear and timely communication fosters collaboration, enhances productivity, and ensures the smooth functioning of teams and projects. Additionally, proactive communication facilitates the exchange of ideas, feedback, and information essential for achieving shared goals and objectives.

4. POLICIES

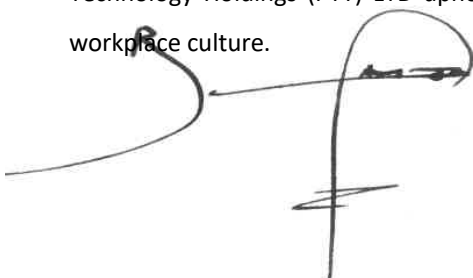
All employees are expected to read and comply with company policies to ensure consistency and adherence to organizational standards. Regular review of policies helps employees stay informed about their rights and responsibilities within the company. In case of any uncertainties or queries regarding policy interpretation, employees are encouraged to proactively seek guidance from their managers, the Human Resources (HR) department or the Legal Department. Open communication regarding policies fosters transparency and promotes a positive workplace culture built on mutual understanding and compliance.

5. DISCIPLINARY ACTIONS

Epsidon Technology Holdings (PTY) LTD may initiate disciplinary measures against employees who knowingly or intentionally violate the Code. Consistent enforcement of our standards ensures a respectful and professional work environment for all employees.

6. REVIEWS

The Code of Conduct serves as a guiding framework for all employees of the Epsidon Technology Holdings (PTY) LTD. As the company evolves and industry standards shift, regular reviews and updates of Epsidon Technology Holdings (PTY) LTD policies are necessary to reflect current best practices and legal requirements. Therefore, this Code of Conduct will undergo periodic reviews by the management team and relevant stakeholders to ensure its continued effectiveness and relevance. Through collaborative refinement, Epsidon Technology Holdings (PTY) LTD upholds its commitment to maintaining a respectful, ethical, and compliant workplace culture.



Mekail Ramjee

(Duly authorised)

Head of Group Risk and Compliance