

CAPIPARTS

YOUR MINING PARTS SPECIALISTS



COMPANY CODE OF CONDUCT



CEP
Capital Equipment Parts

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1. Introduction

This Code of Conduct outlines the ethical principles, compliance requirements, and behavioral expectations for all employees, executives, and business partners. The company is committed to integrity, transparency, and accountability across all operations.





2. GLOSSARY OF KEY TERMS

- ▶ **BRIBERY:** The act of offering, giving, receiving, or soliciting something of value to influence decisions.
- ▶ **CONFLICT OF INTEREST:** A situation where personal interests interfere with professional judgment.
- ▶ **DUE DILIGENCE:** A formal process to verify business entities before engaging in partnerships.
- ▶ **INFLUENCE PEDDLING:** Using one's position to improperly sway decisions for personal gain.
- ▶ **LOBBYING:** Persuading policymakers and government officials to shape business regulations or legislation.
- ▶ **SANCTIONS COMPLIANCE:** Adhering to international laws that restrict business with certain individuals or entities.



3. FIGHT AGAINST CORRUPTION

POLICY

The company strictly prohibits corruption, fraud, bribery, and other unethical practices. All dealings must be fair, transparent, and legal.

 APPROPRIATE BEHAVIOR	 INAPPROPRIATE BEHAVIOR
Refusing an envelope of cash from a supplier seeking preferential treatment.	Offering an under-the-table payment to secure a government contract.

"The strength of a business lies not only in its profits but also in the integrity of its practices."



4. GIFTS AND INVITATIONS

POLICY

Employees must avoid gifts or hospitality that could influence decision-making or create a perception of bias.



APPROPRIATE BEHAVIOR

Accepting a modest corporate-branded pen from a long-standing partner.



INAPPROPRIATE BEHAVIOR

Accepting an all-expenses-paid vacation from a bidder in an ongoing procurement process.



5. COMPLIANCE WITH INTERNATIONAL SANCTIONS

POLICY

Employees must ensure that business transactions comply with international sanctions, avoiding dealings with restricted entities.



APPROPRIATE BEHAVIOR

Conducting background checks on foreign partners before signing agreements.



INAPPROPRIATE BEHAVIOR

Ignoring sanctions lists and proceeding with restricted business transactions.

"Ethical behavior is not a choice; it's a fundamental pillar of sustainable success."



6. INFLUENCE PEDDLING

POLICY

Employees and executives must not misuse their influence to sway decisions improperly, especially when dealing with regulators or government officials.



APPROPRIATE BEHAVIOR

Lobbying in a legally compliant manner by presenting factual industry reports.



INAPPROPRIATE BEHAVIOR

Using personal connections with policymakers to gain preferential regulatory treatment.



7. CONFLICTS OF INTEREST

POLICY

Employees must disclose any situation where personal interests may interfere with professional responsibilities.



APPROPRIATE BEHAVIOR

Declaring a personal stake in a company before participating in procurement decisions.



INAPPROPRIATE BEHAVIOR

Hiding financial interests in a vendor while approving its contract.

*"Do the right thing, even when no one is watching.
Especially when no one is watching."*



8. RECRUITMENT PRACTICES

POLICY

Hiring decisions must be fair, transparent, and merit-based. Nepotism or favouritism is strictly prohibited.



APPROPRIATE BEHAVIOR

Hiring candidates based on experience, qualifications, and an unbiased selection process.



INAPPROPRIATE BEHAVIOR

Hiring an unqualified friend without proper vetting.



9. LOBBYING ETHICS

POLICY

All lobbying efforts must comply with legal frameworks and ethical persuasion techniques.



APPROPRIATE BEHAVIOR

Advocating for fair industry regulations using transparent communication.



INAPPROPRIATE BEHAVIOR

Pressuring officials with undisclosed financial incentives.

"Integrity is the most valuable asset in business, and it's built one ethical decision at a time."



10. BUSINESS PARTNERS & THIRD-PARTY ENGAGEMENT

POLICY

The company must conduct due diligence to ensure that all partners uphold ethical standards and compliance requirements.



APPROPRIATE BEHAVIOR

Reviewing a potential business partner's track record before formal engagement.



INAPPROPRIATE BEHAVIOR

Ignoring reports of unethical behavior from vendors to secure contracts.



11. REPORTING VIOLATIONS & ENFORCEMENT

Employees are encouraged to report misconduct anonymously. Violations may result in disciplinary action, legal consequences, or termination. compliance@capiparts.co.za

"A business that puts ethics first builds a legacy, not just a balance sheet."

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