



XLink Communications (Pty) Ltd

The XLink Code of Conduct

Why we have a Code of Conduct

We have developed this Code of Conduct to provide our employees, customers, business partners and suppliers with a clear guide regarding our commitment to the highest standards of business and ethical conduct.

Our Code of Conduct sets out what we expect from every single person working for and with XLink. It also underlies our responsibilities to our people, partners and shareholders and helps us all make informed decisions and tells us where to go for more information.

This Code will serve to assist and inform our customers about:

- Our engagement values;
- Our business principles;
- Our ethical standards;
- Our customers' rights, obligations and remedies, and where to get more information;
- Where to get help and advice regarding our services, tariffs, fees, billing and terms and conditions for the services; and
- How to lodge a complaint regarding unsatisfactory services.

At XLink, we are committed to complying with all the legal requirements, but as an electronic communication service provider specifically the End-user and Subscriber Service Charter Regulations 2016 (as amended or replaced) and the regulations and related legislation required with regard to the service we provide to our customers.

XLink will regularly review and amend this Code to ensure compliance with legislative and regulatory requirements, as well as when necessitated by commercial requirements from time to time.

Our engagement values

Trust is fundamental to everything that we do.

Doing what is right means we must always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the communities in which we work.

Speed

We drive speed to market. We relentlessly prioritise and pursue the outcomes that matter to our business.

- Makes RAPID business decisions
- Delivers the right things with urgency
- Analyses fast, executes fast

Simplicity

We make things simple for our customers, partners and colleagues.

- Acts and communicates with simplicity
- Prioritises the right things
- Creates a simple working environment

Trust

We are reliable and transparent to deal with. We deliver for others and trust others to do likewise.

- Do what you say you will do
- Trust others to deliver
- Support decisions once made

Our business principles

Individual conduct

We act with honesty, integrity and fairness in our dealings both internally and externally. We do not tolerate any form of bribery, including improper offers of payments or gifts to or from employees. We avoid any contracts that might lead to or suggest a conflict of interests between personal activities and the business. We neither give nor accept hospitality or gifts that might appear to incur any obligations. We pursue mutually beneficial relationships and seek to promote the application of our Business Principles with our business partners and suppliers.

Compliance with the law

We comply with the provisions of all applicable domestic and international laws and appropriate standards and principles.

Health and safety

We protect the health, safety and wellbeing of our customers, employees, partners and the communities in which we operate and disclose any information that comes to our knowledge that clearly demonstrates that any of our products or services breach internationally accepted safety standards or guidelines.

Financial integrity

We provide the best possible return for our shareholders over the longer terms. We base our investment decisions, acquisitions and business relationships on economic criteria but we also take into account social and environmental considerations.

Public policy

We voice our opinions on government proposals and other matters that may affect XLink and our stakeholders. We do not make gifts or donations to political parties or intervene in party political matters.

Communications

We communicate openly and transparently with all our stakeholders within the bounds of commercial confidentiality. We protect confidential information from improper disclosure, and any authorised communication of confidential information should be limited to individuals who need it to carry out their work.

Customers

We value the trust our customers place in us and safeguard the information provided to us.

Employees

We base relationships with and between employees on respect for individuals and their human rights and do not tolerate child labour. We do not accept any form of discrimination, harassment or bullying. We pursue equality of opportunity and inclusion for all employees through our employment policies and practices.

Communities and society

We engage with local communities to help us understand and respond to any concerns they may have. We always provide our stakeholders with access to correct, relevant and current information and build trust through integrity, transparency, honesty and objectivity. We invest in society in a way that makes effective use of our resources, including support for charitable organisations.

Environment

We commit to protecting the environment. We minimise our use of finite resources (such as energy, water and raw materials) and the release of harmful emissions to the environment (including waste, air emissions and discharges to water). We seek to improve the environmental performance of products and services we provide, as well as to support those that offer environmental and social benefits to our customers.

Our ethical standards

Child labour

- No person is employed who is below the minimum legal age for employment.
- Children (persons under 18 years) are not employed for any hazardous work, or work that is inconsistent with the child's personal development.
- Where a child is employed, the best interests of the child shall be the primary consideration.
- Policies and programmes that assist any child found to be performing child labour are contributed to, supported or developed.

Forced labour

Forced, bonded or compulsory labour is not used and employees are free to leave their employment after reasonable notice. Employees are not required to lodge deposits of money or identity papers with their employer.

Health & Safety

- A healthy and safe working environment is provided for employees, in accordance with international standards and national laws. This includes access to clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.
- Where an employee is provided with accommodation, it shall be clean and safe and meet the basic needs of employees.
- Appropriate health and safety information and training are provided to employees.

Freedom of Association

As far as any relevant laws allow, all employees are free to join or not to join trade unions or similar external representative organisations.

Discrimination

Negative discrimination including racial or sexual discrimination is prohibited.

Disciplinary practices

Employees are treated with respect and dignity. Physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited.

Working hours

Working hours of employees comply with national laws and are not excessive.

Payment

Employees understand their employment conditions and fair and reasonable pay and terms are provided.

Individual conduct

No form of bribery, including improper offers for payments to or from employees, or organisations, is tolerated.

Environment

- Processes are in place to actively improve the efficiency with which finite resources (such as energy, water and raw materials) are used.
- Appropriate management, operational and technical controls are in place to minimise the release of harmful emissions into the environment.
- Appropriate measures are in place to improve the environmental performance of products and services when in use by the end user.
- Innovative developments in products and services that offer environmental and social benefits are supported.



Our commitment to listen

If you see behaviour at work which you feel may be a breach of our Code of Conduct or seems illegal or unethical, please report it. You must report any behaviour which you suspect to be unlawful or criminal. This could be bribery, fraud, price fixing or a breach of data privacy.

You must also report abuse of our systems, processes or policies, such as bullying or harassment, a conflict of interest, danger to the health and safety of employees or the public, potential abuses of human rights or serious environmental issues.

XLink has a non-retaliation policy when a genuine concern has been reported. No action will be taken against you if you report such concerns, even if there is no proven unlawful conduct or compliance breach.

Speak up hotline
0800 990 520

How to lodge a complaint

What is a complaint?

A complaint is a formal expression of dissatisfaction by a customer with the received standard of services.

Where to lodge a complaint

Depending on the type of complaint, it must be lodged by contacting XLink as follows:

Service related complaint	Account related complaint or enquiry
<p>Call us on our toll-free number 08600 XLINK (95465) Monday to Sunday (including Public Holidays) 07:00 to 22:00.</p> <p>The call charge will be toll-free if dialled from a landline number, otherwise calls will be charged at the specific service provider's relevant rates.</p> <p>You may send us an email to support@xlink.co.za or, if you do not have access to email, send a facsimile to us on 086 649 7289.</p>	<p>Call us on our toll-free number 08600 XLINK (95465). The call charge will be toll-free if dialled from a landline number, otherwise calls will be charged at the specific service provider's relevant rates.</p> <p>Alternatively, you can contact us on +27 11 438 3000. The Accounts Department is available to assist during business hours from Monday to Friday 08:00 to 17:00.</p> <p>You may send us an email to billing@xlink.co.za, or, if you do not have access to e-mail, send a facsimile to XLink's Account Department on 086 649 4641.</p>

How your complaint will be addressed

We will acknowledge receipt of your complaint together with a reference number, as soon as possible but no longer than two working days.

- You can elect whether you want us to communicate with you telephonically, via text or email.
- We will provide a prompt response and reply as soon as our investigation and research are complete.
- Our Customer Care Agents will be guided by relevant internal policies, procedures and internal training material that is regularly reviewed, e.g. billing and credit procedures, when investigating your complaint.
- Billing complaints will be guided by the following general principles:
 - Services will not be disconnected and the account will not be handed over to collection agencies while the investigation of a disputed portion of a bill is still pending and until the customer has been notified of the results of the investigation and the final decision on the complaint.
 - Customers are not required to pay the disputed portion of the bill in full pending the investigation of the complaint. You are however required to pay the subscription fees and any portion of the bill that is not in dispute.
- In case of service interruption due to defective products, we will communicate to you what steps will be taken to correct the defect, and what alternative arrangements have been put in place during the period, to the fullest extent possible.
- We will listen to your concerns and learn from all the complaints, because they help us to improve our services.
- Our aim is to resolve all complaints as soon as possible and we will endeavour to resolve each complaint within 14 working days of receipt thereof. Depending on the complexity of the matter, it may take longer to resolve, but we will keep you informed of the progress along the way.

What to do if you are not satisfied with the reply

If you have made a specific and serious complaint, you can escalate your complaint by writing to the Executive Head of Operations within 14 days of receiving your reply, who will:

- Acknowledge receipt of your complaint within two days;
- Undertake an investigation of your complaint;
- Decide whether your complaint is justified;
- Instruct the relevant division to take action to correct any errors and prevent the same mistake being repeated;
- Communicate our final decision to you within 14 days of receipt thereof.

You may contact the Chief Operations Officer by email at wendye@xlink.co.za or, if you do not have access to email, by facsimile on 011 501 0455.

What to do if you still think XLink has got it wrong

Customers must first give XLink an opportunity to resolve their justified complaints before they approach ICASA.

A customer who remains dissatisfied with the outcome of his/her complaint after having escalated such complaint to the Chief Operations Officer, may approach ICASA for the resolution of the complaint.

The procedure to follow is set out in the End-user and Subscriber Service Charter Regulations 2016 and can be found on ICASA's website at www.icasa.org.za.