



EAGLE ENGINEERING PROJECT (PTY) LTD

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Company Policy

Code of Business Ethics

All employees of Eagle Engineering Projects (Pty) Ltd must recognize that the good reputation of the company is established by its staff working together to achieve the goals set out for the Company in an honest and ethical manner. Therefore, the individual actions of the employees in the performance of their duties will often be seen as either the actions of Eagle Engineering or as reflecting positively or negatively on the Company. The employees as ambassadors of Eagle Engineering must be seen to, and must maintain a high level of honesty and integrity in all transactions and actions that could in any way reflect on the Company.

This Policy highlights the basic principles that the Company and its employees are to follow in the daily performance of their duties.

Abuse of Office

Employees shall not abuse their office or take any action that may be interpreted as an attempt to benefit from their positions. Abuse of office includes but is not limited to the following:

- Any attempt by employees to use their positions within the Company for personal gains.
- The use of Company funds or assets for unauthorized, improper or personal use.
- Exertion of influence over contractors to the benefit of employees.
- The offering, payment, soliciting or acceptance of bribes in any form.
- The use of Company time to conduct the employee's personal business.
- Any attempt by employee(s) to cover up any impropriety by others in connection with the Company's business.

Conflict of Interest Professional excellence can only be maintained by a culture of honesty, integrity and fairness. Employees must, therefore avoid a conflict between their role in the conduct of the Company's business and their private activities. Where such conflict exists, employees have a duty to make a full disclosure of all the facts to the Company through their manager.

Conflict of interest may arise but is not limited to the following situations:

- Misuse of Company information or Company facilities to which an employee has access.

- Doing personal business during company working hours Accepting employment or consulting for other organizations apart from charitable institutions.
- Charitable work should not conflict with Eagle Engineering Projects (Pty) Ltd work and should be performed outside official hours. Employees accepting outside non-executive directorships or owning shares in privately owned companies, which have any form of business dealings with Eagle Engineering Projects unless with the explicit written approval of the Managing Director. (The above rule does not apply to shares held in publicly quoted companies, which have a business relationship with Eagle Engineering Projects.
- However, if there is any possibility that such a holding could cause a conflict with the exercise of the employee's duties, such conflict should be brought to the attention of the employee's manager in writing).
- If a member of an employee's family has interests (as director, partner, shareholder or influential employee) in companies or businesses which have any form of business dealings with Eagle Engineering Projects and the employee or a close colleague or are likely to become involved in any discussion and/or decisions regarding dealings with such companies or businesses, the employee must inform his Manager in writing.
- Under no circumstances should any personal benefit be derived from such dealing regardless of the degree of involvement.
- No employee should disclose any confidential information about Eagle Engineering Projects affairs to persons not authorized to receive such information. The acceptance of gifts or gratuitous services from contractors which have business dealings with Eagle Engineering Projects and which could place an employee in a position where his independent business judgment may be prejudiced, is forbidden.
- Minor corporate gifts may be accepted.
- All offers of gifts or gratuitous services (whether accepted or rejected) must be reported to the employee's Manager.
- In no case should the employee or his family solicit gifts or gratuitous services from companies currently doing, having done, or planning to do business with Eagle Engineering Projects.
- Inducements (bribes and dash) are at all times unacceptable and should be reported immediately to the employee's Manager.
- Acceptance, directly or indirectly, of payments, services or loans (save for loans obtained from a Bank in the Employee's personal capacity) from a supplier, contractor, sub-contractor or other third parties is forbidden.
- Ownership of property acquired as a result of Company information.
- The Managing Director's approval is needed before any department in the company can accept a major contribution to a Company function, or large-scale entertainment of staff, by any contractor.

Role of The Managers

Each Manager is expected to lead by example, and ensure that all their activities on behalf of the Company are conducted in line with this Code of Ethics.

Managers will be responsible for managing this Code within their departments, and ensuring compliance therewith by all employees.

- All conflicts of interest, whether actual or potential, reported by employees, must be recorded.
- All actual conflicts should be notified to the ED (Finance & Admin) who will then assess the effect of the conflict, and take such steps as may be necessary.
- In respect of potential conflicts, each Manager must first assess whether in fact a conflict exists or may occur. Where such a determination is made, then such conflicts should be reported to ED (Finance & Admin.) for further review.
- The ED (Finance & Admin.) shall be the overall coordinator for this Code.

Where a Manager comes across a situation that suggests that an employee under his supervision may be in a position of conflict, he will be required to draw the employee's attention to the situation and ask the employee to explain the circumstances, prior to taking such further steps as may be warranted.

CLAIMED IGNORANCE SHALL NOT BE ACCEPTED AS AN EXCUSE FOR ACTS CONTRARY TO THIS CODE. ALL BREACHES OF THIS CODE OF ETHICS SHALL ATTRACT DISCIPLINARY ACTION.

1. ROLES AND RESPONSIBILITIES

1.1 Responsibilities of Employers:

- Identify potential hazards which may be present while work is being done, and any equipment is being used.
- Ensure that plant, tools, equipment and machinery are safe, maintained in good working order and those materials and operational processes are without risk to health.
- Establish the precautionary measures that are necessary to protect his or her workers against the identified hazards and provide means to implement these precautionary measures in order to reduce or remove the risks associated with the hazards
- Provide the necessary information, instructions, training and supervision.
- Not permit anyone to carry on with any task unless the necessary pre-measures have been taken.
- Take steps to ensure that every person under his control comply with the requirements of the act.
- Enforce the necessary control measures in the interest of health and safety.
- See to it that work being done and equipment being used is under the general supervision of a worker who has been trained to understand the hazards associated with the work and such a worker must ensure that the precautionary measures are implemented and maintained.
- Delegate responsibilities to employees appointed in terms of the Act
- Decide if employees appointed in terms of the Act may sub-delegate responsibilities.
- Provide employees appointed in terms of the Act with appropriate information, training, facilities and time to execute.

1.2 Duties of Employees

- Take care of his or her own health and safety, as well as that of other persons who may be affected by his or her actions or negligence to act.
- Follow all the health and safety rules and procedures that are provided and communicated by the employer or anyone authorized or competent to do so.
- Wear the prescribed safety clothing or use the prescribed safety equipment where it is required
- Cooperate with an employer or any person who has been authorized by the employer to carry out duties in terms of the act.

- Inform the employer or their health and safety representative of any unhealthy circumstances or acts that they are aware of.
- Give information to an inspector from the Department of Labor if he or she should require it.
- Formally report any incident that they were involved in or aware of that could cause a health risk or that may result in an injury.
- Not to interfere with, damage or misuse anything that is provided in the interest of health or safety. This applies to intentional and or careless or irresponsible actions

Confidentiality

This section describes workplace policies that apply to everyone at our company: employees, contractors, volunteers, vendors and stakeholders alike. These policies help us build a productive, lawful and pleasant workplace.

Confidentiality and data protection

We want to ensure that private information about clients, employees, partners and our company is well-protected.

- Employee records
- Unpublished financial information
- Data of customers/partners/vendors
- Customer lists (existing and prospective)
- Unpublished goals, forecasts and initiatives marked as confidential

We also expect you to act responsibly when handling confidential information.

This policy is important for our company's legality and reputation. We will terminate any employee who breaches our confidentiality guidelines for personal profit.

We may also discipline any unintentional breach of this policy depending on its frequency and seriousness. We will terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

Contractual Obligations

All matters concerned with contracting activity shall be treated as confidential and must be handled strictly in line with applicable procedures put in place by the Company.

All negotiation and other matters leading to a contractual agreement shall be handled with necessary skill and diligence as not to unduly expose the Company to liabilities and to ensure that no personal benefit is derived or unfair advantage given to any contractor.

1. Legislative Compliance

Eagle Engineering Project (Pty) Ltd will follow all aspects of the Occupational Health and Safety

Act no. 85 of 1993 and its Regulations, including any other mentioned documents (i.e. SABS codes). Where specific compliance or risk exists, company rules and procedures will apply.

Any training done with respect to the legislation or company health and safety programme, policies and procedures will be noted and kept on file. Any person who does not adhere to this legislation will be guilty of an offence and thus be disciplined according to the disciplinary code.

2. Injury Reporting

In terms of the Occupational Health & Safety Act no. 83 of 1993, all injuries and incidents must be reported immediately or as soon as practically possible, for assessment, recording; or possibly investigation.

3. Wearing of Personal Protective Clothing (PPC)

Various occupations will be identified in the job specification as requiring PPC to be worn by the employees. Employees will be required to sign for the PPC, to follow the procedure and undergo training required for correct usage.

Where Safety clothing or equipment has been issued, it will be seen as an offence if these are not worn at all times, and thus disciplinary action, according to the disciplinary code, will be taken on non-compliance.

4. Hazardous Chemical Substance in Daily Use

Material Safety Data Sheets will be available regarding the safe use, storage etc, of all chemical substances in use on site. Each department will have the relevant information in an accessible file and ensure the necessary training, according to Section 13 of the Occupational Health & Safety Act & Regulations, is given to all.

5. Working when it Rains

Every employee who works in the open air must wear suitable protective clothing on any working day during which it rains. Depending on the level, rate or concentration of the rainfall, the supervisor concerned may require employees who work in the open air to continue working whilst it rains, provided they wear suitable protective clothing.

The supervisor concerned must evaluate the rainfall level, extent, concentration and the effect it has on the safety, health and qualitative production of employees working in the rain. Should the supervisor be of the view that the level, rate or concentration of the rainfall affects the safety, health, effectiveness or qualitative production of the employees, he/she must order work be abandoned forth with and order such employees to move to a suitable place identified by the supervisor where there is shelter.

Should the supervisor upon his/her assessment of the weather conditions be of the view that there is slim and/or no prospects of the stoppage of rainfall, he/she may instruct the employees to abandon work and return to the relevant depot, workshop or plant.

Any employee removed from a worksite in the open air due to rain may be expected to perform other duties at the depot, workshop or plant, which will not expose her/him to rain.

Health and Safety Procedures

Workplace Safety and Protective Clothing Rules

Your safety is the constant concern of Eagle Engineering Projects (Pty) Ltd.

Common sense and personal interest in safety are still the greatest guarantees of your safety at work, on the road, and at home. We take your safety seriously and any willful or habitual violation of safety rules will be considered cause for disciplinary actions. Eagle Engineering Projects is sincerely concerned for the health and well-being of each member employee.

The cooperation of every employee is necessary to make Eagle Engineering Projects a safe place in which to work. Help yourself and others by reporting unsafe conditions or hazards immediately to your supervisor, give earnest consideration to the rules of safety presented to you by poster signs, discussions with your supervisor, posted department rules, and regulations published in the safety booklet. Begin right by always thinking of safety as you perform your job, or as you learn a new one.

(a) Accident reporting: Any injury at work—no matter how small—must be reported immediately to your supervisor and receive first aid attention. Serious conditions often arise from small injuries if they are not cared for at once.

(b) Specific safety rules and guidelines: To ensure your safety, and that of your coworkers, please observe and obey the following rules and guidelines:

- Observe and practice the safety procedures established for the job.
- In case of sickness or injury, no matter how slight, report at once to your supervisor. In no case should an employee treat his own or someone else's injuries or attempt to remove foreign particles from the eye.
- In case of injury resulting in possible fracture to legs, back, or neck, or any accident resulting in an unconscious condition, or a severe head injury, the employee is not to be moved until medical attention has been given by authorized personnel.
- Do not wear loose clothing or jewellery around machinery. It may catch on moving equipment and cause a serious injury.
- Never distract the attention of another employee, as you might cause him or her to be injured. If necessary, to get the attention of another employee, wait until it can be done safely.
- Where required, you must wear protective equipment, such as goggles, safety glasses, masks, gloves, hair nets, etc.
- Safety equipment such as restraints, pull backs, and two-hand devices are designed for your protection. Be sure such equipment is adjusted for you.
- Pile materials, skids, bins, boxes, or other equipment so as not to block aisles, exits, firefighting equipment, electric lighting or power panel, valves, etc. **FIRE DOORS AND AISLES MUST BE KEPT CLEAR.**
- Keep your work area clean.
- Use compressed air only for the job for which it is intended. Do not clean your clothes with it and do not fool with it.
- Observe smoking regulations.
- Shut down your machine before cleaning, repairing, or leaving.
- Tow motors and lift trucks will be operated only by authorized personnel. Walk-type lift trucks will not be ridden and no one but the operator is permitted to ride the tow motors. Do not exceed a speed that is safe for existing conditions.
- Running and horseplay are strictly forbidden.
- Do not block access to fire extinguishers.

- Do not tamper with electric controls or switches.
 - Do not operate machines or equipment until you have been properly instructed and authorized to do so by your supervisor.
 - Do not engage in such other practices as may be inconsistent with ordinary and reasonable common-sense safety rules.
 - Report any **UNSAFE** condition or acts to your supervisor.
 - **HELP TO PREVENT ACCIDENTS.**
 - Use designated passages when moving from one place to another; never take hazardous shortcuts.
 - Lift properly—use your legs, not your back. For heavier loads, ask for assistance.
 - Do not adjust, clean, or oil moving machinery.
 - Keep machine guards in their intended place.
 - Do not throw objects.
 - Clean up spilled liquid, oil, or grease immediately.
 - Wear hard sole shoes and appropriate clothing. Shorts or mini dresses are not permitted.
 - Place trash and paper in proper containers and not in cans provided for cigarette butts.
- **Safety checklist:** It's every employee's responsibility to be on the lookout for possible hazards. If you spot one of the conditions on the following list—or any other possible hazardous situation—report it to your supervisor immediately.
 - Slippery floors and walkways
 - Tripping hazards, such as hose links, piping, etc.
 - Missing (or inoperative) entrance and exit signs and lighting
 - Poorly lighted stairs
 - Loose handrails or guard rails
 - Loose or broken windows
 - Dangerously piled supplies or equipment
 - Open or broken windows
 - Unlocked doors and gates
 - Electrical equipment left operating
 - Open doors on electrical panels
 - Leaks of steam, water, oil, etc.
 - Blocked aisles
 - Blocked fire extinguishers, hose sprinkler heads
 - Blocked fire doors
 - Evidence of any equipment running hot or overheating
 - Oily rags
 - Evidence of smoking in non-smoking areas
 - Roof leaks
 - Directional or warning signs not in place
 - Safety devices not operating properly
 - Machine, power transmission, or drive guards missing, damaged, loose, or improperly placed
- (c) **Safety equipment:** Your supervisor will see that you receive the protective clothing and equipment required for your job. Use them as instructed and take care of them. You will be charged for loss or destruction of these articles only when it occurs through negligence.
- (d) **Safety shoes:** Eagle Engineering Projects will designate which jobs and work areas require safety shoes. Under no circumstances will an employee be permitted to work in sandals or open-toe shoes.

(e) Safety glasses: The wearing of safety glasses by all shop employees is mandatory. Strict adherence to this policy can significantly reduce the risk of eye injuries.

(f) Good housekeeping. Your work location should be kept clean and orderly. Keep machines and other objects (merchandise, boxes, shopping carts, etc.) out of the center of aisles. Clean up spills, drips, and leaks immediately to avoid slips and falls.

Place trash in the proper receptacles. Stock shelves carefully so merchandise will not fall over upon customer contact.

(g) Induction training: All new employees must be properly informed of this policy and the contents thereof, and must sign to acknowledge receipt of a copy. This policy is therefore a part of each employee's service contract and where necessary specific conditions in this regard must be additionally included in the service contract.

(h) Disregarding of policy conditions: Disregarding of the policy conditions will be dealt with in accordance to the existing disciplinary procedures.

Workplace safety and health

Our company is committed to creating a hazard-free workplace. To this end, we will [ensure workplace safety](#) through preventative action and emergency management.

Preventative action

Preventative actions are any actions we take to avoid injuries or illnesses related to the workplace. We will periodically conduct risk assessments and job hazard analyses [*through a workplace safety committee*] to uncover health risks to employees. And we will establish preventative measures to address risks accordingly.

At a minimum, we will:

- [*Hold employee training sessions on safety standards and procedures.*]
- [*Make sure employees who work in dangerous locations are safe.*]
- [*Provide protective gear like gloves, protective uniforms and goggles.*]
- [*Direct inspectors and quality control employees to evaluate equipment and infrastructure regularly.*]

We also expect you to take safety seriously. Always use protective equipment and follow standards whenever necessary. If you deliberately disregard our guidelines, we may terminate you for your own and others' safety.

Emergency management

Emergency management refers to our plan to deal with sudden catastrophes like fire, floods, earthquakes or explosions. Our emergency management provisions include:

- [*Functional smoke alarms and sprinklers that are regularly inspected.*]
- [*Technicians (external or internal) available to repair leakages, damages and blackouts quickly.*]
- [*Fire extinguishers and other fire protection equipment that are easily accessible.*]

- [An evacuation plan posted on each floor and online.]
- [Fire escapes and safety exits that are clearly indicated.]

Smoking

Eagle Engineering Projects (Pty) LTD is a [smoke-free workplace](#). You can smoke in [designated smoking areas, balconies, open-air verandas and outer premises, like gardens and sidewalks.] Any other area in our workplace (like restrooms, lobby, offices, staircases, warehouses) is strictly smoke-free to protect non-smokers.

We also advise you to:

- Extinguish your cigarettes and discard them in [outdoor ashtrays, cigarette urns.]
- Avoid smoking when you have scheduled meetings with clients or vendors.
- Avoid smoking near flammable objects and areas.

Setting off fire alarms and causing fires by smoking are serious offenses. If you are found responsible, you may face disciplinary action up to and including termination.

Drug-free workplace

Eagle Engineering Projects (PTY) LTD is a [drug-free workplace](#). Whether you are an employee, contractor or visitor, you must not bring, use, give away or sell any drugs on company premises. If you are caught with illegal drugs, or show that you are under the influence of substances, you will face disciplinary action up to and including termination.

A list of prohibited drugs and substances includes, but isn't limited to:

- [heroin/cocaine/methamphetamine in any form]
- [marijuana]

Alcohol

We prohibit employees from consuming alcohol during working hours, but they may consume alcoholic drinks in moderation at company events.

Prescription drugs

If you feel that a prescription drug (e.g. an anxiety medication) unexpectedly affects your senses, thinking or movement, ask for the rest of your day off. If your manager suspects substance abuse, you may face disciplinary action.

You [*must not*] use medical marijuana in our workplace. We have the right to terminate you if your off-duty use of medical marijuana makes you unable to complete your job duties correctly.

We expect employees who hold safety-sensitive jobs (e.g. machine operators or drivers) to be fully alert and capable of performing their duties at all times. We may terminate you if we conclude your prescription drug use creates severe safety risks. If you need to use prescription drugs for a limited time and you think they may impair your abilities, use your PTO or sick leave.

If your job includes secondary tasks that are safety-sensitive and your prescribed drugs affect your ability to perform these tasks, we can make reasonable accommodations to ensure you and your colleagues' safety.

Dealing with addiction

Being sober is a prerequisite to thriving at our company and we want to help you as much as possible.

We won't tolerate substance addiction that results in violent, offensive or inappropriate behaviour.

Harassment and violence

To build a happy and productive workplace, we need everyone to treat others well and help them feel safe. Each of us should do our part to prevent harassment and workplace violence.

Workplace harassment

[Harassment](#) is a broad term and may include seemingly harmless actions, like gossip. We can't create an exhaustive list, but here are some instances that we consider harassment:

- *[Sabotaging someone's work on purpose.]*
- *[Engaging in frequent or unwanted advances of any nature.]*
- *[Commenting derogatorily on a person's ethnic heritage or religious beliefs.]*
- *[Starting or spreading rumours about a person's personal life.]*
- *[Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g. bringing coffee) against their will.]*

Sexual harassment is illegal and we will seriously investigate relevant reports. If an employee is found guilty of sexual harassment, they will be terminated.

If you're being harassed, whether by a colleague, customer or vendor, you can choose to talk to any of these people:

- **Offenders.** If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly in an effort to resolve the harassment. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.) Avoid using this approach with customers or stakeholders.
- **Your manager.** If customers, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and may contact HR if appropriate.
- **HR.** Feel free to reach out to HR in any case of harassment no matter how minor it may seem. For your safety, contact HR as soon as possible in cases of serious harassment (e.g. sexual advances) or if your manager is involved in your claim. Anything you disclose will remain confidential.

Workplace violence

Violence in our workplace is a serious form of harassment. It includes physical and sexual assault, destruction of property, threats to harm a person or property and verbal and psychological abuse.

We want to avoid those incidents altogether, but we also want to be ready to respond if needed.

For this reason, we ask you to:

- *[Report to HR if you suspect or know that someone is being violent. Your report will be confidential and we will investigate the situation with discretion.]*
- *[Call our building's security if you witness incidents of severe physical violence (e.g. ones that involve a lethal weapon.) For your safety, avoid getting involved.]*

We will treat employees who verbally threaten others as high risk and they will receive an appropriate penalty. If HR finds that an employee commits an act of violence, we will terminate that employee and possibly press criminal charges. Employees who damage property deliberately will be solely responsible for paying for it.

Get help early on

Seek help from others early on to mitigate conflicts. For example:

- If you experience conflicts with a colleague, ask your manager for advice before tensions escalate. If these conflicts persist, ask HR whether you could attend conflict resolution seminars with your colleague.
- If you are experiencing personal or work troubles, ask for help from a *[mental health professional.]* Check with your insurance provider to determine whether they cover any mental health services or ask HR for information on our Employee Assistance Program (EAP). Your discussions will remain confidential.

Our workplace is founded on mutual respect and we won't allow anyone to compromise this foundation.