

Retina SA	Human Resources		
Policy and Procedure	Policy	Business Code of Conduct	July 2017

BUSINESS CODE OF CONDUCT

1. INTRODUCTION

This Business Code of Conduct contains general guidelines for conducting the business of Retina South Africa.

This code applies to all of our directors, officers, employees and members, including but not limited to the Foundation's consultants, agents and advisors, wherever they are located and whether they work for the Foundation on a full or part-time basis. The code refers to all persons covered by the code as employees, or volunteers. This code also refers to our executives including, but not limited to our chairman, secretary, treasurer, vice chairman, and the Management Committee.

Retina South Africa is committed to conducting business lawfully and ethically. If a law conflicts with a policy in this code, you must comply with the law.

While it is not possible to list all policies and laws to be observed, or all prohibited business practices to be avoided, this Business Code of Conduct helps to detail the Foundation's expectations of every employee.

This code must be observed in spirit, not just to the letter. Adherence to these principles is an essential part of the responsibilities of all employees and shall form part of their contractual obligations with the Foundation and hence they should at all times conduct themselves as per this code.

Those who violate the standards in this code will be subject to disciplinary action, up to and including dismissal, notwithstanding any further civil or criminal action that may be taken. If you are in a situation which you believe may violate or lead to a violation of this code, follow the guidelines described in this Code or in the Policies and Procedure Manual.

2. SAFETY IN THE WORKPLACE

Retina South Africa believes that a workplace should be safe and civilised; we will not tolerate sexual harassment, discrimination or offensive behaviour of any kind, which includes the persistent demeaning of individuals through words or actions, the display or distribution of offensive material, or the use or possession of weapons on our premises.

3. EQUAL EMPLOYMENT OPPORTUNITY

Retina South Africa is an equal opportunity employer. This means that we will extend equal opportunity to all individuals without regard to race, religion, colour, sex, national origin, age, disability, or veteran status. This policy affirms Retina South Africa's commitment to the principles of fair employment and the elimination of all vestiges of discriminatory practices that might exist.

4. GENERAL EMPLOYEE CONDUCT

Employees must conduct themselves in a business-like manner and perform their duties conscientiously, honestly, and in accordance with the best interest of the Foundation.

5. CONFLICTS OF INTEREST

Each employee is required to be free from any private interest that might conflict with the interest of the Foundation or which makes it difficult to perform their work objectively and effectively.

Employees must not use their position or knowledge gained as a result of their position for private or personal advantage.

6. OUTSIDE ACTIVITIES

Employees must avoid acquiring any business interest or participate in any other activity outside the Foundation that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving the Foundation of their best efforts on the job.
- Create conflict of interest – An obligation, interest, or distraction that may interfere with the independent exercise of judgment in the Foundation's best interest.

7. PRIVACY AND CONFIDENTIALITY

When handling medical and personal information of patients or others with whom the Foundation has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the Foundation's business.
- Whenever possible, obtain any relevant information directly from an individual concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law.
- Protect the physical security of this information.
- Limit access to medical information on a need to know basis.
- Patients right to confidentiality is to be protected at all times and no names of patients are to be disclosed in any public documents unless express permission has been granted by the patient.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information.
- Use only personal information for the purposes for which it was originally obtained.
- Obtain consent of an individual concerned before disclosing any personal information unless legal process or contractual obligations provide otherwise.

8. HARASSMENT

Retina South Africa will not, under any circumstances, condone or tolerate conduct that may constitute physical or sexual harassment from any of its employees.

9. RELATIONSHIPS WITH CLIENTS/SUPPLIERS

Employees must avoid investing in or acquiring a financial interest for their own account in any business organisation that has a contractual relationship with the Foundation. If such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the Foundation.

10. GIFTS, ENTERTAINMENT AND FAVOURS

Employees must not accept entertainment, gifts, or personal favours that could, in any way, influence or appear to influence business decisions in favour of any person or Foundation with whom or with which the Foundation has or is likely to have business dealings.

Similarly, employees must not accept any other preferential treatment under these circumstances because their position with the Foundation might be inclined or perceived to place them under obligation.

11. KICKBACKS AND SECRET COMMISSIONS

Employees must not receive payment or compensation of any kind regarding the Foundation's business activities, except as authorised by the management committee. In particular, the Foundation's strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others.

12. FUNDS AND OTHER ASSETS

Employees who have access to the Foundation's funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Foundation's instruction manuals or other explanatory material, or both.

The Foundation imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud, dishonesty or acts of corruption, they must immediately advise the management committee so that they can promptly investigate further.

When an employee's position requires spending of Foundation funds or incurring any reimbursable personal expenses, that individual must use good judgement on the Foundation's behalf to ensure that good value is received for such expenditure.

Funds and all other assets of the Foundation are for the Foundations purposes only and not for personal benefit. This includes the personal use of Foundation assets, such as computers. Employees may not undertake private or personal work during regular working hours, nor may they undertake such work of other employees. Such practices should be brought to the attention of the management committee.

13. RECORDS AND COMMUNICATIONS

Accurate and reliable records of many kinds are necessary to meet the Foundation's legal and financial obligations and to manage the affairs of the Foundation. The Foundation's books and records must reflect in a timely and accurate manner all business transactions. The employees responsible for accounting and record keeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or other misleading statements.
- False advertising, deceptive marketing practices, or other misleading representations.

14. DEALING WITH OUTSIDERS

Employees must take care to separate their personal roles from their Foundational positions when communicating on matters not involving Foundation business. Employees must not use Foundation identifications, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve Foundation business, employees must not presume to speak for the Foundation on any topic, unless they are certain that the views they express are those of the Foundation and it is the Foundation's desire that such views be publicly disseminated.

When dealing with anyone outside the Foundation, including public officials, employees must take care not to compromise the integrity or damage the reputation of the Foundation or any outside individual, business, or government body.

15. PROMPT COMMUNICATIONS

In all matters relevant to customers, suppliers, government authorities, the public and others in the Foundation, all employees must make every effort to achieve complete, accurate and timely communications – responding promptly and courteously to all proper requests for information and to all complaints.

16. COMMUNICATIONS

The Management Committee is solely responsible for all official external communications. Other employees, unless directed by management, are to refer all calls from members, healthcare practitioners, researchers, genetic counsellors and other external audiences to the Director of Science/Management Committee.

17. PROTECTION AND USE OF FOUNDATION ASSETS

All employees of the Foundation should protect the Foundation's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. The Foundation's assets should not be used for non-Foundation business. Any act that involves theft, fraud, embezzlement or misappropriation of any property is prohibited.

The obligation of employees and representatives of the Foundation to protect our assets includes our proprietary information, intellectual property and innovative ideas. These intangible assets are very valuable to the Foundation and must be appropriately managed and protected.

18. ADMINISTRATIVE MATTERS REGARDING CODE

Every of the Foundation shall be given a copy of this code.

19. NON-EXCLUSIVITY

No representation is expressed or implied that the policies stated herein are all the relevant policies nor that they are a comprehensive, full or complete explanation of the laws or standards of conduct that are applicable to the Foundation and its employees. All Foundation employees have a continuing obligation to familiarise themselves with applicable law and Foundation policy.

20. WAIVERS OF CODE AND BUSINESS CONDUCT

Any waivers of the provisions of this code for the Foundation's officials and other employees may be granted only by the Foundation's Management Committee.

21. UNSOLICITED NEGOTIATION (SPAM)

Employees must not send or promote the sending of bulk email and must take reasonable measures to ensure that their networks are not used by others for this purpose. Employees must be mindful that they are obliged to comply with the provisions of the Electronic Communications and Transactions Act 2002.

22. CONCLUSION

This code's standards reflect the general principles to guide employees. This code and the matters contained herein are subject to revision at the sole discretion of the Foundation and they are not a guarantee of continuing Foundation policy.