

The Heart of Capitec: our ethics statement



Purpose

The Ethics Statement will be the instrument for setting ethical standards and governing the ethics of the Capitec Group in a way that supports the promotion of an ethical culture. The Statement will articulate and give effect to the Board's direction on Capitec's ethics.

Read along with this content

Ethics Management Framework
Policies and standards as referred to in Annexure A

Version

V01

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Document Adherence

All Employees of Capitec Bank Holdings Limited,

Committee to Approve

Social, Ethics and Sustainability Committee

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From our Ethics Office

“At Capitec we live our CEO values of client first, energising our people and taking ownership. Our purpose of making banking simple and transparent while remaining true to our fundamentals of simplicity, affordability, accessibility, and personalised experience shape what we do every day.

We acknowledge our commitment to unlocking our people’s potential whilst living out our CEO values and the important role that ethical behaviour plays in maintaining the trust of our people. We therefore remain committed to the highest ethical standards and commit ourselves to the ethical values and standards as set out in our Ethics Statement and by doing so we remain focussed on improving the lives of our clients and our people.

Each of us has a responsibility to always conduct ourselves with a high degree of honesty and integrity which is at the heart of what we do at Capitec”

MD Palmieri – Capitec Group Ethics Officer

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1. **Scope**

At Capitec, ethics is at the heart of how we conduct our business. Capitec people “live CEO”, but what does it mean? Simply put, it is how we do things at Capitec and why we believe that no other bank can help people the way we do.

The Ethics Statement is the instrument that sets out Capitec’s ethical principles and governs our ethics in a way that supports the continuation of an ethical culture across the Capitec group.

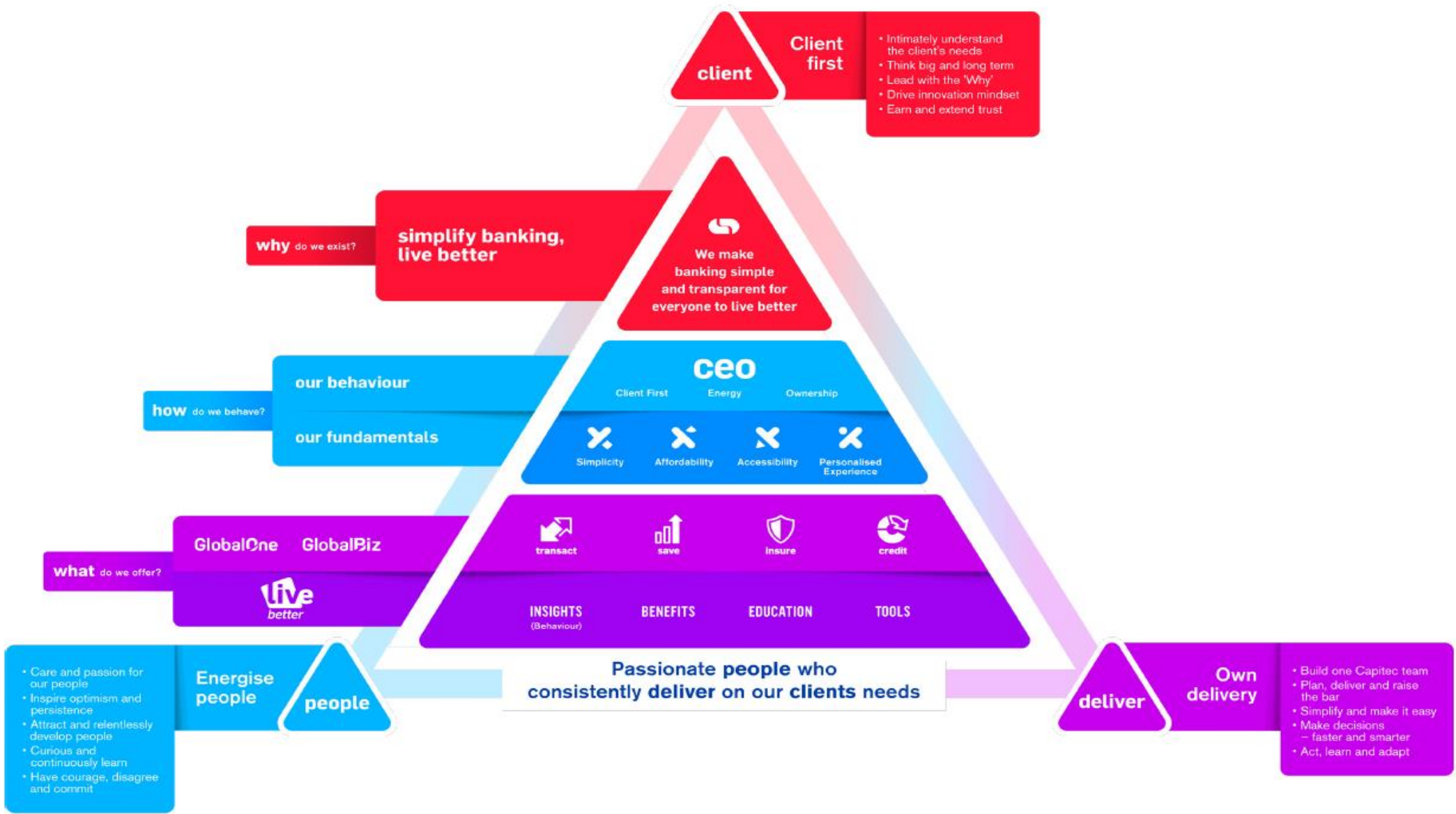
The Ethics Statement is applicable to Capitec and all its subsidiaries, all employees, contractors, and business activities conducted by Capitec. For the purpose of this document, “employees” include permanent, temporary and fixed term employees.

2. **Purpose and Objective**

Capitec believes in making banking simple and transparent for everyone to live better, by providing products and services in a simplified, affordable, and accessible manner that focusses on providing a personalised experience to our clients.

Capitec has firmly entrenched our CEO values of client first, energise people and owning delivery in Capitec’s DNA, which is underpinned by our leadership principles.

The purpose of this Statement is to guide all Capitec employees on expected ethical values that guides our behaviour when making banking simpler and transparent for everyone to live better.



3. The values at the heart of Capitec

3.1 Capitec's Ethical Values

3.1.1 Business Ethics

3.1.1.1 Our purpose is to create sustainable value for our clients and stakeholders, by improving people's financial lives and helping them to live better by banking better.

3.1.1.2 Capitec is committed to high ethical values and to conduct our business honestly, responsibly and with integrity.

3.1.1.3 We hold our employees, clients, suppliers and business partners to the highest order of honesty and integrity.

3.1.2 CEO Values

The CEO Values outline Capitec's ethical values and drive our behaviours when engaging with fellow employees, clients, shareholders, business partners, suppliers, regulators and the broader community.

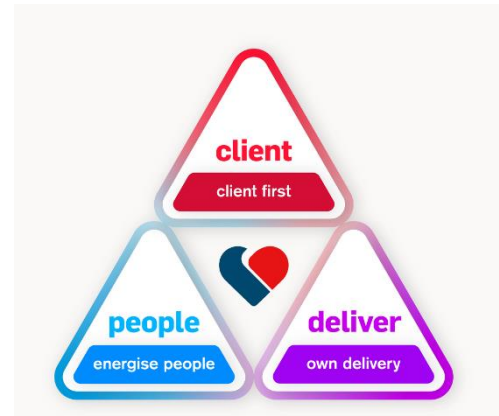
We live our core values of putting our clients first, energising our people and taking ownership.



3.1.3 Leadership principles

Capitec is committed to the founding fundamentals of simplicity, accessibility, affordability and personalised service.

Our leadership principles underpin our CEO values and help guide and inspire our actions to unlock the full potential of Capitec as a whole. We acknowledge that in order to serve the best interest of Capitec we are committed to upholding the highest ethical standards to ensure the long term sustainability of the Bank.



3.2 Human Rights Principles

Capitec commits itself to upholding the equality and dignity of all people and gives recognition to their basic human rights. Capitec conducts its business in accordance with recognised human rights practices as per Capitec's internal human rights statement.

Capitec takes cognisance of the fact that due to the nature of our business, we may be influential in promoting protection of basic human rights and will therefore disassociate ourselves from practices resulting in human rights abuses.

3.2.1 Diversity, Equity, and Inclusion

3.2.1.1 Capitec values diversity and transformation as an organisational strength while considering the diversity of our client base as well as our employees. Capitec supports and promotes economic as well as social diversity, equality and inclusion.

3.2.1.2 Capitec appreciates and recognises the historical background of South Africa and is therefore guided by employment equity legislation and is committed to treating all employees in a fair and equitable manner and creating a climate of inclusivity.

Capitec is guided by the following principles on which our employment equity philosophy is based on namely; respecting diversity, integrity, transparency, ownership and support.

3.2.2 Non-discriminatory practices

Capitec will not unfairly discriminate against anyone including our employees, clients, third parties and shareholders on any grounds as referred to in the Bill of Rights as per the Constitution of the Republic of South Africa.

3.2.3 Corporate social investment ("CSI")

Capitec supports ethically-orientated practices. We are committed to community initiatives and the wellbeing of the community. We are committed to supporting initiatives that improve the lives of the people in South Africa.

We are mindful of the important role that the youth plays in South Africa, which is why our CSI programme focuses on effective education and skills. We support initiatives that will advance quality education and job creation.

All CSI donations made by Capitec is done in an ethical and transparent manner.

3.2.4 Sponsorships and donations

The purpose of Capitec sponsorship and donation initiatives is to improve the lives of our clients and to empower them.

While we acknowledge that participation in sponsorships and donations may give rise to risks, we are committed to upholding our ethical values when partaking in these initiatives.

3.3 Environmental rights

3.3.1 Environmental sustainability

As per Capitec's Environmental Policy, Capitec recognises the importance of environmental sustainability and is committed to minimising the impact of our activities on the environment by optimising resource utilisation, incorporating environmental considerations into Capitec's overall risk management processes and promoting environmental awareness amongst our employees.

3.3.2 Climate change

Capitec is committed to combatting climate change by implementing environmental considerations into Capitec's overall environmental, sustainability and governance strategy.

3.3.3 Carbon footprint accounting

Capitec acknowledges our ethical responsibility to continuously report on sustainability issues, and therefore going forward, Capitec plans to review how we can apply this for future target setting purposes for GHG emissions and align to the goals set by the Paris Agreement.

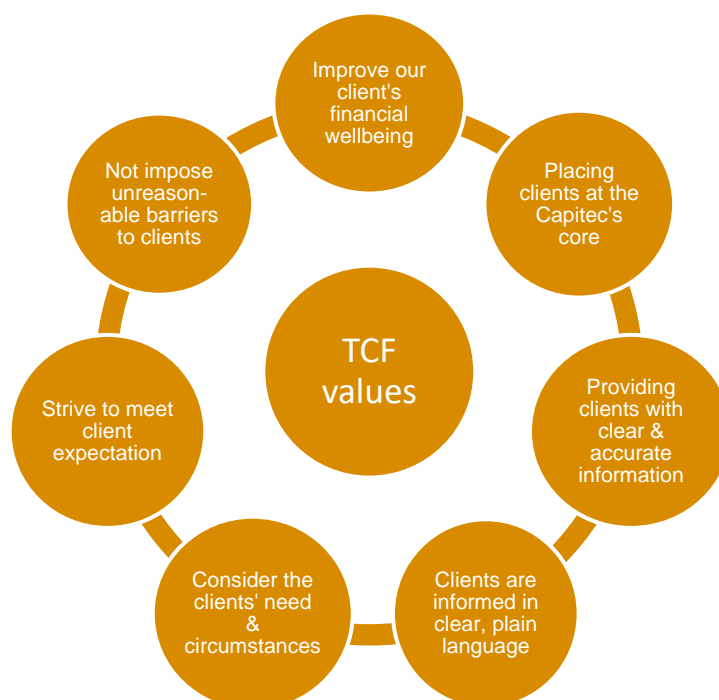
3.4 Value 1: Client First

At Capitec, we continuously work to earn and retain our clients trust and see all employees as ambassadors of the Capitec brand. We uphold our company values and consistently hold ourselves accountable to the utmost ethical standards of Capitec.

3.4.1 How we treat our clients

3.4.1.1 Treating customers fairly ("TCF")

Capitec undertakes to always act honestly, fairly, with due skill, care and diligence, in a manner which aims at always treating our clients fairly We apply the following TCF values as outlined in our Market Conduct Statement and various other internal policies that guide our interactions with our clients



3.4.1.2 **Complaint management**

Capitec regards the effective management of complaints as important as stated in our Complaint's Management Framework. The way in which Capitec handles complaints is integral to our continuous improvement approach and to ensure that we put the client first.

3.4.1.3 **Confidentiality and protection of personal information**

Capitec is conscious of the constitutional right to privacy and ensures that personal information is kept confidential, securely and is ethically treated.

Privacy preservation is reliant on trust, which is why Capitec strives to be open and transparent about how we collect and process personal information. In support hereof, further information is publicly disclosed in our Privacy Centre on our website <https://www.capitecbank.co.za/privacy-centre/>.

3.4.2 **The products and services that we offer**

Capitec is committed to addressing our clients needs and challenges, to allow them to Bank Better and Live Better. Capitec encourages our employees to be innovative and invite creative thinking and problem solving.

3.4.2.1 **Capitec's Recipe**

The Capitec Recipe is a process embedded when introducing and delivering on any new product or service. Amongst its other purposes, the recipe ensures that ethical implications have been taken into consideration when developing any new product or service.

Capitec values innovative thinking and the importance of developing technology to serve our clients better, however, Capitec also understands the importance of maintaining high ethical values during this innovation process.

3.5 **Value 2: Energise our People**

At Capitec, we strive to create an environment that is diverse, inclusive, and safe. Capitec realises our people's efforts, contributions and endeavours to create a place where our people can thrive.

3.5.1 **Employee behaviour**

The expected behaviour of our employees is guided by various policies, which is made available internally to all our employees via our intranet (CNet), and embedded in our processes. The expected behaviours include:

3.5.1.1 **Compliance with rules, laws, and regulations**

Capitec requires that all employees must always ensure compliance with the laws, rules, policies, processes, and regulations which apply to Capitec.

3.5.1.2 **Honesty**

All employees must carry out the duties entrusted to them carefully, responsibly, honestly, with the necessary due diligence and in the best interest of Capitec.

3.5.1.3 **Respect**

Employees must always treat each other with dignity and respect.

3.5.1.4 **Substance abuse and smoking**

Capitec does not allow its employees to be in possession of, or use, any illegal drugs or be under the influence of any intoxicating substances when performing their duties or representing Capitec in any capacity.

We encourage our employees to consume alcohol moderately and responsibly when attending work functions.

Smoking outside of designated areas are not allowed.

3.5.1.5 Gossiping / spreading rumours

Capitec encourages courageous conversations and therefore discourages gossiping, spreading of fake news and rumour mongering as this leads to an unfavourable working environment.

3.5.1.6 Dress code

While the organisation appreciates each employees individuality, it is important that employees project a consistent and professional image. Capitec encourages each of its employees to take pride in their appearance as they represent the Capitec brand.

3.5.1.7 Personal use of organisation's resources

Employees are discouraged from using the organisation's resources for personal use, but where the organisations resources are used for personal reasons, it is expected of our employees to conduct themselves ethically and to take care of and respect such resources.

3.5.1.8 Freedom of association

Capitec supports its employees' constitutional rights to freedom of association and right to fair labour practices. Employees have the discretion to join unions to support and protect these rights.

3.5.2 Recruitment, Remuneration & Transformation

Economic equality and transformation are important principles consistently applied in Capitec's employment practices.

3.5.2.1 Recruitment and promotions

Capitec is committed to sourcing and attracting suitable people with the appropriate skills for the right job, with due regard for an employee workforce that is representative of the demographics of South Africa.

Our recruitment process is consistent and fair and we do not condone nepotism, cronyism or favouritism of any sort. Capitec supports the appointment and promotion of employees on their own individual merit.

3.5.2.2 Remuneration and incentives

Remuneration is managed ethically as guided by our Remuneration Policy, in line with industry best practices and all applicable labour legislation. Capitec is committed to developing remuneration strategies that best serve the interest of our employees and stakeholders through sustainable growth.

We recognise the efforts of individuals in helping create the success of Capitec through incentives that are determined in an ethical, fair and responsible manner and appropriately aligned to performance.

3.5.2.3 Workforce re-skilling / continuous learning and development

Capitec aims to engage, develop, reward, and retain employees by providing them with learning opportunities.

The Capitec Bursary Scheme provides financial assistance to Capitec's permanent employees to obtain qualifications in fields that support Capitec's strategic objectives.

The selection criteria and application process, as detailed in our internal Bursary Policy, for these initiatives are fair and reasonable and in line with Capitec's objectives and ethical values.

3.5.3 Employee well-being

3.5.3.1 Employee benefits

The physical, financial and emotional wellbeing of our employees are of utmost importance. At Capitec we strive to improve the lives of our employees by providing them with generous employee benefits, while ensuring such benefits do not promote or entice unethical behaviour.

3.5.3.2 Leave benefits

Capitec encourages our employees to make use of their leave benefits to ensure that they take regular breaks for their mental and physical health.

3.5.3.3 Employee wellness

Capitec's employee wellness programme ("AskNelson") provides support to our employees with a clear focus on both physical and psychological wellbeing of the employee.

3.5.3.4 Occupational health and safety

Capitec provides an maintain a working environment that is safe for our employees, clients, third parties and the public.

3.5.3.5 Harassment, discrimination, racism, victimisation, and gender-based violence ("GBV")

Capitec acknowledges the impact that harassment (both sexual and non-sexual harassment), discrimination, racism, victimisation and GBV has on our employees and the broader society. Capitec has zero tolerance for any form of unethical behaviour that leads to these forms of harassment (both sexual and non-sexual) and abuse. Any form of harassment and abuse will be dealt with in accordance with our disciplinary code and as per our internal harassment policy.

3.5.3.6 Grievance process

We encourage constructive dispute resolution. The grievance process is therefore fair and reasonable and aims at resolving disputes, attending to grievances and creating a safe working environment.

3.5.3.7 Disciplinary code

The Disciplinary Code and procedure was developed to ensure both the successful achievement of Capitec's objectives and for the safety and fair treatment of our employees as well as to promote ethical behaviour, acceptable conduct, mutual respect and in support of constructive and fair labour relations. Any unethical behaviour, including discriminatory behaviour and harassment, will be subject to our disciplinary code.

3.5.3.8 **Sound and fair labour practices**

At Capitec, we have an ethical responsibility to ensure that our employees are guaranteed sound and fair labour practices. Capitec always aims at providing equitable and unbiased protection for both our employees as well as the bank.

3.6 **Value 3: Own Delivery**

Capitec consistently prioritises and focuses to deliver value to our stakeholders. We plan carefully and implement efficiently to continuously raise the bar by challenging the status quo and set new standards to deliver better results.

3.6.1 **Shareholder Relations and Governance**

3.6.1.1 **Board oversight and executive accountability**

The Board is ultimately responsible for the operations, risk and governance of the bank. In taking this full responsibility, the board will ensure that they execute their duties with the necessary care, due diligence, integrity and skill.

The Board of Directors acknowledges that they have a duty to conduct business in an ethical manner and to the ultimate benefit of its shareholders, employees and the broader society.

All disclosures made to the shareholders will always be truthful, accurate and will not be misleading.

3.6.1.2 **Business continuity**

Capitec is aware that we have an ethical obligation to ensure that our business operations can continue in the event of a disaster. Capitec will secure the preservation of critical data and functions, and where not possible, there will be progressive recovery of said data or function to minimise potential operational and financial losses.

3.6.1.3 **Regulatory and legislative compliance**

Capitec seeks to achieve and maintain a good and healthy compliance culture by complying with all regulatory and legislative requirements. This compliance culture is closely linked to our ethical values and principles. Capitec commits to providing our employees with training and understanding of our ethical responsibilities.

3.6.2 **Anti-bribery and corruption**

3.6.2.1 **Preventing financial crime, bribery, and corruption**

Capitec acknowledges that bribery and corruption erodes trust, hinders economic development, and undermines human rights and the rule of law. Capitec is committed to conduct all our activities free from any form of bribery and corruption to ensure we deliver on our commitment to conduct our business with high levels of honesty, integrity and good governance in all our business practices.

3.6.2.2 **Fraud, corruption, and collusion**

Capitec requires all employees to act honestly and with integrity and considers fraudulent activity as any form of dishonesty that can result in damages or bring harm to Capitec's brand and ethical values (employees are directed to our internal Fraud Policy). Capitec has zero tolerance for any form of fraud, corruption and collusion.

3.6.2.3 **Insider trading**

Capitec will not trade or disclose insider information and has zero tolerance for insider trading. Further information relating to insider trading is detailed in our Conflict of Interest Policy.

3.6.3 Whistleblowing

Capitec encourages all employees and stakeholders to report any concerns or incidents where ethical conduct is being questioned.

Employees and external parties may make use of our tip-off anonymous hotline to report any of their concerns or incidents. The hotline is managed by an independent external third party to ensure complete anonymity and confidentiality.



The tip-off toll free number is available on the [Capitec Home page](#) on C-Net (Intranet)



Whistleblowing serves as a fundamental tool to enable the reporting of incidents and to provide for whistleblower arrangements and protection. Capitec ensures complete anonymity and confidentiality for whistleblowers where required.

Whistleblowers are protected against any form of victimisation or prejudice and will not be discriminated against for reporting concerns or incidents.

Any form of whistleblowing will be acted upon in a swift and ethical manner and dealt with accordingly.

3.6.4 Conflict of interest

Conflict of interest arises when there are personal interest which could impact, or which could be perceived as impacting our objectivity, judgment or our ability to act in the best interest of Capitec.

Employees should at all times act with the best interest of the bank and avoid any actual or perceived conflict of interest.

It is expected of our employees to disclose whether they hold any employment or have business interests outside of Capitec. These obligations or interests may not interfere with the the employee's day-to-day Capitec duties.

Employees are expected to disclose any financial interest, ownership interest or any relationship with a third party, which may unduly influence the objective performance of our obligations.

Further information regarding Conflict of Interest can be found in our Conflict of Interest Policy read together with the FAIS Conflict of Interest Policy.

3.6.5 Gifts, invitations, and hospitality benefits

The giving and receiving of gifts, invitations and hospitality benefits in relation to stakeholders and third parties can lead to improper influence in decision making and threatens the objectivity of employees when conducting official duties and therefore high ethical standards must always be maintained.

Capitec provides direction to our employees on expected ethical behaviours in relation to the giving and receiving of gifts, invitations and hospitality benefits which also extends to third parties and other stakeholders.

3.6.6 Third Party Relationships

3.6.6.1 Third party business relationships (partners, suppliers, and vendors)

Capitec values its relationships with third parties, including partners, suppliers (refer to Supplier Code of Conduct) and vendors and will always ensure that these business relationships are underpinned by integrity, transparency and openness.

When conducting business with third parties, the necessary due diligence and care is given to prevent any potential conflict of interest, bribery, collusion or corruption.

3.6.6.2 Relationship with regulators

Capitec's relationship with Regulators is vital to our continued operation and sustainability and therefore we are committed to building, developing and maintaining mutually beneficial relationships with the regulatory bodies that regulate the industry within which we operates.

All engagements with regulators must be conducted in a manner which is consistent with the CEO principles and Capitec's strategic objectives.

Capitec will maintain an open, honest and transparent relationship with regulators and ensure compliance with all regulatory requirements.

3.6.6.3 Relationship with government

Capitec fosters a healthy relationship with the government and supports government initiatives relevant to our business, including transformation and equality, and in doing so will always be honest and transparent in our communication.

3.6.6.4 Relationship with competitors

Maintaining a healthy relationship with our competitors is important because it drives good business practices and fosters a healthy, competitive environment. Capitec will refrain from any campaign smearing and collusion and will work together with industry roleplayers on issues of mutual interests through social dialogue with industry bodies.

3.6.6.5 Relationship with public officials and political parties / political affiliations

Capitec will not align or position ourselves or our brand in support of any specific public official, political party or political affiliations by providing any financial contributions or any other contributions in kind.

3.6.6.6 Procurement practices

Capitec's procurement practices allow for fair and equal opportunity to compete for business, as we promote responsible and inclusive procurement practices.

3.6.7 Capitec Communication

Capitec acknowledges that our ethical values are demonstrated through our actions and communications with our employees, clients, stakeholders, regulators, suppliers and third parties.

3.6.7.1 Media engagement

The content of all media enquiries and engagements will always be truthful and accurate and Capitec will not share any misleading information or misrepresent the bank or the brand to the public.

3.6.7.2 Brand positioning

Capitec undertakes never to position the brand or align with any other organisation, engagements, individuals or alike, that does not share the same ethos or foster the same values as Capitec.

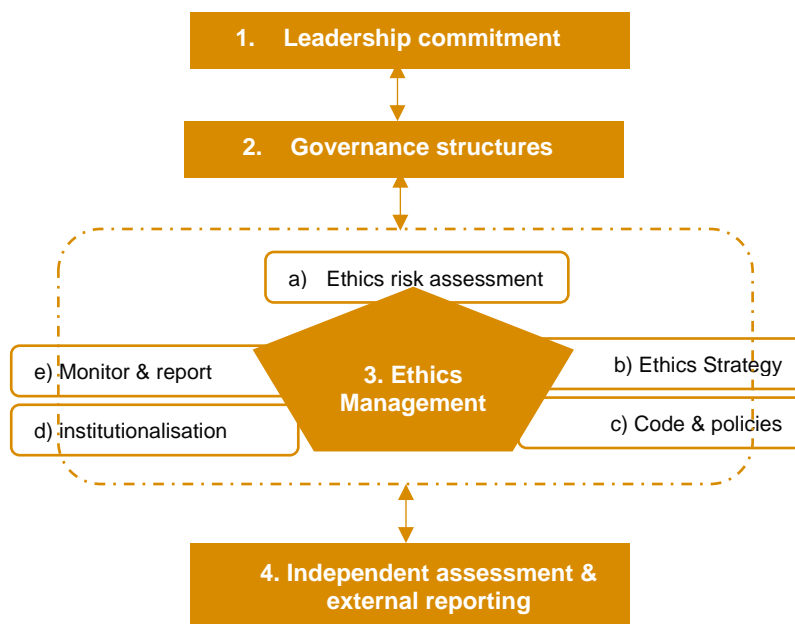
3.6.7.3 Social media

Capitec’s designated team will ensure that all engagements through social media platforms are fair and factually correct to ensure that we put our clients first.

Employees are encouraged to refrain from bringing Capitec into disrepute when expressing their personal views and opinions through their personal social media platforms.

4. Mitigation and Management of Ethical Risks

Ethics risks are managed and mitigated as per the below model to ensure leadership is committed to maintaining an ethical culture, that the necessary governance structures have oversight over the management of ethical risks, that the process of managing ethics is well developed and to ensure independent assessment of all ethical risks.



5. Governance, roles, and responsibilities



5.1 Board Oversight and Governance

The Board remains ultimately accountable and responsible to its employees, shareholders and the broader society with regards to all risk management, as well as the embedding of ethical values in Capitec's DNA.

5.2 Social, Ethics and Sustainability Committee

The committee is a board committee and the chairperson must account to the board and the shareholders.

The committee is responsible to oversee the implementation and approval of the Ethics Management Framework.

5.3 Ethics Office

The Ethics Office is an independent function responsible for developing and coordinating all ethics related strategies and interventions across the organisation.

The primary function of the Ethics Office is to provide advice and guidance to employees and management on matters of ethics and conduct in the workplace.

The Ethics Office is the anchor of a successful corporate ethics culture and ensures awareness and understanding of Capitec's core CEO values and ethical standards.

6. Conclusion

The Ethics Statement guides our employees on their expected behaviours when making banking simpler and transparent for everyone to live better.

Employees should consistently act in accordance with the ethical values in this statement. Every employee has the responsibility never to act in a way which may raise doubt on Capitec's ethical values.

Annexure A (Related Policies, Procedures and Standards)

Policies and standards are compiled and owned by policy owners and are reviewed on at least an annual basis and approved in terms of the Delegation of Authority approval document.

The policies and standards (see below) are supported by business operating procedures which give effect to the policies and standards.

The following policies, standards and methodologies will form part of this Ethics Framework as a whole and not just limited to this Ethics Statement:

Policy/Standard/Framework	Description
Capitec Group Human Rights Statement	Capitec's statement of intent towards upholding human rights
Environmental Policy	To inform employees regarding the approach of Capitec Bank with regards to responsible and environmentally friendly usage of resources. The policy provides guidelines that must be considered when decisions are made regarding designs and procurement.
Reporting on Carbon Footprint	Outlines the basis on which Capitec accounts for carbon emissions.
Disciplinary Code	To ensure that the employer and employees share a mutual understanding of misconduct and discipline, promote acceptable conduct, mutual respect, and support constructive labour relations at Capitec.
Occupational Health and Safety Policy	To outline the appropriate occupational health and safety instructions and resources to ensure effective implementation and the on-going compliance of the Occupational Health and Safety Act.
Smoking Policy	To enforce stipulations of the Tobacco Products Act 83 of 1993 and its amendments.
Harassment Policy	To contribute to the creation and maintenance of an environment of mutual respect and professional conduct in the workplace.
Dress Code Policy	To describe the dress code for Capitec Bank employees as an extension of the brand presented to the market, to stress the importance of adherence to the policy and address general administrative requirements.
Leave Policy	To regulate the leave process and benefits, to manage leave effectively while adhering to all relevant Legislation.
Email Usage Policy	To provide standards and guidelines for the use of email at Capitec.
Compensation for Loss of Personal Items Policy	To provide guidelines for the compensation of employees for the loss or damage of personal items in and outside the workplace.
Volunteer Framework	To provide information on employee volunteering and to set the framework for the process to follow when volunteering for community upliftment work through the bank.
Bursary Policy	Outlines the requirements of the bursary scheme for a potential application.
Employment Equity Policy	Provides a framework for the creation and maintenance of an equitable work environment in Capitec.
Remuneration Policy	Defines remuneration the relationship between the bank and its employees.
Talent Acquisition Policy	To clarify the roles and expectations of all parties involved in the talent acquisition process.
Personnel Safety and Security Policy	To outline the responses that are available to all employees who may find themselves in a situation that threatens their personal safety.
Board Policy on Balance of Power and Authority	To ensure that there is a balance of power and authority at board level.
Disaster Recovery Procedure	To communicate the disaster recovery process.
Business Continuity Policy	Formalises Business Continuity Management in Capitec and provides guidelines for the development, maintenance and exercising of Business Continuity.
Compliance Policy	To formalise and communicate Capitec's approach to compliance and to define the roles and responsibilities of each employee.
Enterprise Risk Management Policy	To provide an overview of Capitec's approach to risk management by outlining the principles, guidelines, processes, and models adopted by the business to ensure that the risk is managed to an integrated approach.
Tax Risk Management Policy and Framework	To provide detailed guidelines to perform any tax related function or process, and to instruct personnel on the policies regarding all tax matters.
TCF Policy	To communicate to all relevant parties, the approach that the Financial Sector Conduct Authority (FSCA)

Complaints Management Framework	To ensure that Capitec can effectively deal with client queries across the various channels.
Capitec Bank Language Policy	Outlines Capitec's language policy, which was drafted with the objectives of Section 63 of the National Credit Act 34 of 2005.
Client Engagement Campaign and Program Management Policy	To share how the bank intends to nurture and enhance its relationship with clients through one-to-one communication.
Media Policy	Governs the relationship with the media, including identifying our spokespersons, social media enquiries and the Capitec Foundation.
Communications Policy	Policy dictates all forms of communication within the bank, in order for all employees to understand management's expectation thereof.
Enterprise Data Privacy Policy	Formalises data governance principles, practices and associates' roles and responsibility for effective data governance.
Data Governance and Management Framework	To ensure that information is effectively managed through its full life cycle.
Information Security Policy	To define the information security directives and controls to preserve the confidentiality, integrity and availability of Capitec information assets.
Market Conduct – Culture and Governance Standard	To detail the culture and organisational governance standards that must be adhered to by the bank, to ensure that the conduct requirements set out in relevant regulatory instruments are complied with
Market Conduct – Product and Service Design	This document provides for the product and service design and performance standards that must be adhered to by the bank in order to fulfil market conduct related requirements.
Capitec Recipe	Governs the process embedded when introducing and delivering on any new product or service.
Capitec Bank FAIS Conflict of Interest Management Policy	To adopt, maintain and implement a Conflict of Interest Management Policy that complies with the requirements of the Financial Advisory and Intermediary Services Act, 37 of 2002.
Conflict of Interest Policy	A separate policy to govern all other conflicts of interest not dealt with by the FAIS Conflict of Interest Policy must be developed.
AML / TF / PF Policy	Formalise Capitec's policy on the control of money laundering and the financing of terrorist and related activities to enable Capitec and its employees to comply with the requirements of anti-money laundering and terrorist financing laws and regulations.
RMCP Apex	Describes the end-to-end control framework implemented by Capitec to identify, assess, monitor, mitigate and manage financial crime risk to which the bank may be exposed.
Risk Appetite Statement	To define Capitec's risk appetite and acceptance framework
Fraud Policy	Detail the procedures to be followed when fraud is suspected and discovered.
Gifts and Invitation Policy	Outlines the policy and procedures for Capitec employees applicable to the receiving of gifts and invitations by individuals and corporate entities.
Sponsorship Policy	Outline the focus areas of Capitec's corporate sponsorship and the criteria to be adhered to when organisations or institutions request a Capitec sponsorship.
Regulatory Engagement Policy	Policy provides authority to certain designations to liaise with Regulators, also provides which must be followed during an engagement.
Disclosure Policy	Outlines the guiding principles for the disclosure in terms of regulatory reporting obligations.
Procurement purchasing policy	To inform employees of the policy to be followed when procuring goods and services.