



## **CODE OF BUSINESS ETHICS AND RESPONSIBLE BEHAVIOUR ('THE CODE')**

The business of Warwyck Phoenix PCC (the 'Company') is founded on mutual trust and public confidence. These attributes have to be earned and sustained over a long period by the successive generations of people who work in the business and can be lost overnight by irresponsible or unethical behaviour. The purpose of this Code is to set out in some detail the enduring principles which will have to be observed throughout the Company. They fall under three general principles - integrity, fidelity and self-respect - basic qualities which the Company expects of every employee. They also include certain corporate values to which the Company subscribes and which must govern our business ethics.








These qualities are also reflected in the Core Standards of Behaviour which will form part of the performance measurement process asset out in the Employee Handbook.

Whilst the Code is not contractual, it does form part of the general standards of conduct which the Company expects all employees to reach. Failure to abide by the Code may result in disciplinary action being taken against the employee, which could include dismissal.

The Code (including the Core Standards of Behaviour) may be altered or modified from time to time by notice to the employee or by circular.

### **Integrity**








Integrity implies being fully worthy of the trust placed in us by our clients and employer by being honest, impartial and truthful. This means:

-  Acting at all times in an honest and upright manner both in our corporate and personal dealings, recognising that our personal conduct may reflect on the Company.
-  Scrupulously refraining from illegal, fraudulent, dishonest or unethical behaviour, particularly in relation to financial and/or business dealings.
-  Never using confidential information for personal gain or abusing the trust placed in us by the Company and our customers.
-  Avoiding conflict between self-interest and the interest of the employer or customer, and being ready and willing to disclose any potentially compromising or conflicting business relationships or shareholdings. The Audit Committee has been given explicit responsibility for reviewing and approving any conflicts-of-interest and related-party transactions and for working with the auditor on detecting and reporting on related-party transactions.
-  Ensuring that where the employment of relatives of existing employees is being considered that the existing employee is not involved in the decision-making process of recruitment, salary, promotion or retention. In addition, relatives should not be involved in the transacting, processing or auditing of the same activity. It is important to ensure that there are no conflicts of interest in the roles of the relatives.
-  Avoiding gifts, services or hospitality, on a scale which could be interpreted as affecting integrity or the ability to exercise independent judgement, except if expressly approved in writing by the Company.
-  Declining secondary employment or offers of consultancies or directorships, except as may be provided for by your offer letter or expressly approved in advance in writing by the Company.








## **Fidelity**

Fidelity embraces duties of loyalty, confidentiality and citizenship in relation to the affairs of the Company and our customers. This means promoting the good standing and name of the Company and defending it against unwarranted criticism.

-  Ensuring that any undertakings given are within our personal capacity and fully honoured.
-  Making a proper use of the organisation's property.
-  Safeguarding all the Company's information and restricting access to any confidential or sensitive documents.
-  Keeping our customers' business, financial and personal affairs confidential by not disclosing information to third parties without their express consent, except where required by law or established Company practice.
-  Taking care over our communications – oral, written or electronic – to prevent others acquiring confidential information.
-  Complying fully with the laws and regulations of all countries in which we do business, including tax management activities, and with the published codes of relevant institutions.
-  Not knowingly engaging in business which might in any way be associated with, or regarded as supportive of, illegal or criminal activities, construed as bribery or corruption or, which would be contrary to the national interests.



## **Self-Respect**

Self-respect is enhanced by professionalism, good citizenship and conscientiousness. This means:

-  Maintaining your dignity and promoting that of fellow employees, by not bullying or victimising colleagues for any reason and by promoting equal opportunities within the Company.
-  Acquiring the necessary skills, knowledge and experience to conduct business dealings or tasks in a professional manner and keeping abreast of current developments. Acting with the utmost courtesy at all times.
-  Giving due consideration not just to the immediate financial effects of decisions but also their wider implications.
-  Avoiding practices which could make you vulnerable to financial difficulties or which could lead to malpractice e.g. gambling (except for very modest stakes).
-  Seeking help and advice from colleagues where difficulties arise in matters of professional judgement or conduct and adopting an approach of openness and teamwork.

## **Corporate Values (in relation to personal conduct)**

These include:

-  Not knowingly allowing the Company to place itself in a position where its duty to one customer or client conflicts with its duty to another.
-  Ensuring that the provision of services to suppliers or potential suppliers of goods and services



to the Company, is considered on a wholly objective basis and not tied to any form of reciprocal agreement.

- ❏ Observing the spirit and letter of regulatory requirements
- ❏ Maintaining the Company records and systems so that all transactions are recorded in an accurate and prompt fashion and not falsifying records or obscuring, omitting or misrepresenting facts in records or communications.
- ❏ Reporting to the appropriate internal level of authority any behaviour which contravenes the law, regulatory requirements, or the spirit of this Code.

### **Core Standards of Behaviour**

The Company has integrity, trust and excellent customer service at the heart of its values. Application of these in all that we do builds our reputation, unites us, sets us apart from the competition and ultimately makes us even more successful.

#### ***Personal Appearance***

All employees are expected to dress in a professional manner. Employees are required:

- ❏ to present or create a professional or identifiable appearance for customers, suppliers, and the public;
- ❏ to promote a positive working environment and limit distractions caused by outrageous, provocative, or inappropriate dress; and
- ❏ to ensure safety while working.

Employees at all levels and job positions are representatives of the Company and therefore, their dress, grooming, and personal hygiene affect both the public's impression of the Company as well as internal morale. Employees will not be allowed to display visible tattoos or piercing.






The Company is sensitive to the need to balance attire and appearance as a personal concern with its responsibility to provide an environment that is safe, nurturing, and supportive of the Company's goals and responsibilities.

#### ***Active Listening***




- ❏ Listening carefully to customers and colleagues giving them undivided attention and asking thoughtful questions to confirm facts.
- ❏ Being genuinely concerned about others and ready to act in their best interests.







### ***Understanding***

-  Greeting customers, clients, and colleagues in a polite, friendly and personalised manner.
-  Demonstrating a pleasant, enthusiastic, helpful manner when dealing with customers, clients, colleagues and other people whom we work with or who work in our premises.
-  Communicating relevant information clearly and accurately.
-  Treating all customers, clients, colleagues and other people whom we work with or who work in our premises, with dignity and respect, ensuring that each receives the very best service.
-  Handling all customer, client and colleague enquiries, instructions and complaints promptly, willingly, accurately and efficiently.



### ***Freedom to Deliver***

-  Taking pride in providing excellent customer service and personal responsibility for getting things right first time.
-  Positively challenging existing processes in order to improve the quality of service and remove the barriers that impede us from deepening our relationship with customers and clients.
-  Adopting a 'can do' approach and taking appropriate action to meet the needs of customers, clients and colleagues.

### ***Integrity***

-  Acting in an open and honest way, recognising that personal conduct reflects on the Company.
-  Attending work and carrying out your duties regularly and punctually and being committed to the team effort.
-  Actively promoting the Company as a reputable organisation.
-  Maintaining appropriate standards of responsible behaviour, dress and appearance.

### ***Straightforward***

-  Addressing all matters, particularly difficult issues, with frankness, facts and tact.
-  Ensuring that all commitments given are achievable and fully honoured.

### ***Forward Thinking***

-  Developing skills and knowledge required to do your current job well and improve your own



performance.

- 🌸 Being adaptable and maintaining a positive approach to change.
- 🌸 Thinking ahead and anticipating customers' and colleagues' needs.

### **Teamwork**

- 🌸 Sharing knowledge, best practice and experience to support colleagues in the achievement of their goals.
- 🌸 Leading by example, contributing to team morale.
- 🌸 Actively contributing to the overall team effort.
- 🌸 Treating all colleagues with dignity and respect.
- 🌸 Placing team goals before own individual goals, if appropriate.

### **Privacy Statement**

The Company recognizes the importance our customers place on the privacy and security of their personal information. Our goal is to protect personal information in every way that the Company interacts, whether it's on the telephone, in our lobby, or on the Internet. The Company may utilize the services of third party providers to assist in providing online services, such as website hosting. These third party providers are referred to within this policy as "*service providers*".

#### ***A. Information Collected on the Internet***

While browsing through our website, we do not request any personally identifiable information, nor do we collect unique identifying information unless voluntarily and knowingly provided to us, such as when an email is sent to us. If this information is provided to us, it is only used internally and in furtherance of the purpose for which it was provided.

Service providers hosting our website may collect general information on our website visitors. They collect the following information on our behalf for security and statistical purposes:

- i. The Internet address (referral site) which brought you to our website;
- ii. The date and time you access our site;
- iii. The name and version of your web browser;
- iv. The Internet service provider you used when you accessed our site;



- v. Your Internet Protocol (IP) address; and
- vi. The pages visited in our website.

Our service providers may use cookies to collect some of the above information. They may also use cookies for security purposes. Additionally, cookies may be used for customization and personalization of our website.

Additional information about IP addresses and cookies are provided below.

### ***Internet Protocol (IP) Addresses***

An IP address is a number that is automatically assigned to your computer whenever you are on the Internet. Web servers, the computers that "serve up" web pages, automatically identify your computer by its IP address. When collecting information for us, our service provider does not link IP addresses to anything personally identifiable; however, this Institution and its service providers may use IP addresses to audit the use of our site. We can and will use IP addresses to identify users when necessary for security purposes.

### ***What is a Cookie?***

A cookie is a very small text file sent by a web server and stored on your hard drive, your computer's memory, or in your browser so that it can be read back later. Cookies are a basic way for a server to identify the computer you happen to be using at the time. Cookies are used for many things from personalizing startup pages to facilitating online purchases. Cookies help sites recognize return visitors.

Our service provider uses cookies for security purposes and to facilitate the customization and personalization of our website. For security purposes, our service provider does not store any personally identifiable information in cookies, which are further described below.

### ***B. Website Cookies:***

When clicking on advertisements in our website or advertisements on linked third party websites, you may receive another cookie. You do not have to accept these cookies to visit the website.

### ***Use of Information Collected***

We do not disclose any non-public personal information about our customers, former customers, and website visitors to anyone, except as permitted or required by law.

We do not sell any of your personal information.



We will not disclose any medical information that you provide to us, unless you specifically authorize its disclosure.

We may disclose aggregate (not personally identifiable) customer information that we collect on our website to service providers, companies, and/or financial institutions that perform marketing and research services on our behalf and with whom we have joint marketing agreements. Our contracts require these service providers, companies and/or financial institutions to protect the confidentiality of your personal information to the same extent that we must do.

### *C. Email Policies*

We may send you email notices for certain required disclosures if you agree to accept electronic disclosures and/or online account statements. If you have agreed to accept disclosures electronically, we may send you an email with updates to this policy and/or we may send you an email at least annually to remind you where the Privacy Policy can be viewed from our website..

Our website may include numerous links to other third-party sites. These links to external third parties are offered as a courtesy and a convenience to our customers. When you visit these sites, you will leave our website and will be redirected to another site.

The Company does not control linked third party sites. We are not an agent for these third parties nor do we endorse or guarantee their products. We make no representation or warranty regarding the accuracy of the information contained in the linked sites. We suggest that you always verify the information obtained from linked websites before acting upon this information. Also, please be aware that the security and privacy policies on these sites may be different from our policies, so please read third party privacy and security policies closely.

If you have questions or concerns about the privacy policies and practices of linked third parties, please review their websites and contact them directly. This privacy policy applies solely to information collected by Warwyck.

### *D. Security*

The Company and its service providers have developed strict policies and procedures to safeguard your personal information. We restrict employee access to your sensitive personal information on a "need to know" basis. We maintain physical, electronic, and procedural safeguards that comply with the Mauritian regulations to guard your non-public personal information.

We educate our employees about the importance of confidentiality and customer privacy. We take appropriate disciplinary measures to enforce employee privacy responsibilities.



#### E. Comments or Complaints by Customers

Any comments or complaints about these policies, any privacy-related issue or any inaccuracy in customer data can be made by contacting:

Warwyck Phoenix PCC  
Warwyck House, Nalletamby Rd  
Phoenix 73538, Mauritius  
Tel : (230) 698 2700  
Email : [fundmanagement@warwyckphoenix.com](mailto:fundmanagement@warwyckphoenix.com)