



# **TRANSMEDIA**

## **CORPORATION (PVT) LTD**

### **PROPOSED CODE OF ETHICS**

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## **CODE OF ETHICS**

### **Preamble:-**

Transmedia Corporation is a private limited company wholly owned by the Government of Zimbabwe. It was founded in 2001 and licensed as the sole provider of TV and radio signal carrier services.

The Board of Transmedia Corporation has deemed it essential to establish a Code of Ethics for its staff and members to inculcate a consistently high degree of moral and ethical values on the part of employees in carrying out their activities to fulfil the Corporation's mandate.

Transmedia Corporation embraces this Code of Ethics as a guideline of conduct reflecting moral standards and ethical values that would ensure a credible environment of professionalism.

### **Concept and Scope:-**

The Code of Ethics is a comprehensive statement of the values and principles, which should guide the daily work of employees.

The Code of Ethics covers the ethical requirements of the Corporation's employees including their professional obligations. While the Code is intended to provide a clear definition of responsibilities, it cannot address all the possible challenges which the employees may face in performing their duties and responsibilities. The Code places clear responsibility on individual employees for their own conduct and behaviour.

The Code may be altered from time to time to take account of changed circumstances and situations.

### **Purpose:-**

The purpose of having this Code is to: -

- (a) Set out the core values on which the professional conduct of Transmedia employees is based.
- (b) Help employees identify the ethical principles that form the standards and core values of the Corporation. These principles establish the standards of behaviour expected of the employee. The fundamental principles are: integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.
- (c) To guide employees in making ethical decisions in management of the Corporation's business activities, in compliance with the requirements of the law.

(d) The Code is an extension of the Corporation's values and adoption of the Code constitutes a declaration of our commitment to act to achieve our goals while exhibiting integrity and reliability to our shareholders, customers, suppliers, business associates, employees and all stakeholders.

**Vision:-**

To be the Signal Carrier and Multiplexer of choice in the Zimbabwean Multimedia industry.

**Mission:-**

To provide world class multiplexing and signal carrier services to all citizens of Zimbabwe as well as provide the most efficient broadband technologies to chosen clients in Zimbabwe

**Values:-**

Honesty and Integrity –	Practice integrity, honesty, and fairness with our stakeholders
Quality service –	make every customer contact a pleasant experience
Fairness –	provide our staff with equal opportunities to develop their full potential by ensuring quality leadership, rewarding performance, and encouraging innovation.
Reliability –	provide reliable radio and television transmission, content provision and related telecommunications solutions.

**The Code of Ethics:-**

1. *Professional behaviour:-*

Transmedia undertakes to comply with the requirements of the law anywhere it operates including labour laws, financial reporting laws and regulations. Employees to be well-versed and comply with the relevant laws and regulations and should avoid any action that discredits the Corporation.

Any deficiency or delinquency in the professional conduct or any improper conduct by employees in their personal lives places the integrity and quality of their work in unfavourable scenario and may raise doubts about the reliability and competence of the Corporation.

Personnel should be well mannered, show respect and polite social behaviour to all and sundry. In other words, they should exhibit habits of good breeding and etiquette both at work and outside.

## *2. Confidentiality:-*

Employees should respect the confidentiality of information acquired during their work and should not disclose any such information to third parties without proper or specific authority.

Employees shall comply with the principle of confidentiality, which requires all employees to respect the confidentiality of information acquired as a result of professional and business relationships. Employees shall:-

- (a) Be alert to the possibility of inadvertent disclosure, including in a social environment, and particularly to a close business associate or an immediate or a close family member;
- (b) Maintain confidentiality of information within the Corporation
- (c) Not disclose confidential information acquired as a result of professional and business relationships outside the Corporation without proper and specific authority, unless there is a legal or professional duty or right to disclose;
- (d) Not use confidential information acquired as a result of professional and business relationships for the personal advantage of the accountant or for the advantage of a third party;
- (e) Not use or disclose any confidential information, either acquired or received as a result of a professional or business relationship, after that relationship has ended.
- (f) Not disclose confidential information to other employee levels which are not consumers of such information.

## *3. Integrity and reliability:-*

Integrity – to be straightforward and honest in all professional and business relationships.

Integrity is the core value of the Code of Ethics. Employees have a duty to adhere to high standards of behaviour (e.g. honesty, fairness, candidness, and truthfulness) in the course of their work.

Integrity can be measured in terms of what is right and just. Integrity requires employees to observe both the form and spirit of ethical standards. Employees should not knowingly be a party to any illegal activities or engage in acts that are discreditable to the Corporation.

Transmedia undertakes to conduct business in an honest, ethical and professional manner with respect to all entities with which it maintains business contacts. In addition, Transmedia takes a zero-tolerance approach to bribery and corruption.

#### *4. Professional Competence and Due Care:-*

Employees should:-

- (i) Attain and maintain professional knowledge and skill at the level required to ensure that the Corporation receives competent professional service, based on current technical and professional standards and relevant legislation.
- (ii) Act diligently and in accordance with applicable technical and professional standards.

Employees have a duty to conduct themselves in a competent and professional manner at all times and to apply high professional standards in carrying out their work. They have to dedicate themselves to the enhancement of quality and capability through programmes of professional education and personal development.

Employees must not undertake work they are not competent to perform. They should know and follow applicable policies, procedures, and practices.

The Corporation shall comply with the principle of professional behaviour, which requires employees to comply with relevant laws and regulations and avoid any conduct that the employees know or should know might discredit the Corporation.

Employees shall not knowingly engage in any business, occupation or activity that impairs or might impair the integrity, objectivity or good reputation of the Corporation.

5. *Objectivity:-*

Employees should not compromise professional or business judgments because of bias, conflict of interest or undue influence of others.

6. *Striving for constant improvement:-*

As an organisation striving for excellence, Transmedia will continue to set challenging goals for the Corporation and will strive to meet them. The Corporation will establish, on a yearly basis, work plans and a budget for the purpose of achieving such goals.

Employees must dedicate themselves to the enhancement of quality and capability through programmes of professional education and personal development.

7. *Quality service:-*

Employees must strive to provide customers with high quality service, in compliance with the customer's legitimate requirements. The Corporation will act constantly to improve the quality of its service and to expand the variety of services provided to its' customers.

8. *Economy, Efficiency and Effectiveness of Operations:-*

Employees have a responsibility to try earnestly to achieve cost reduction and ensure the efficiency and effectiveness of the Corporation and thus maximize Value for Money for the shareholder.

9. *Protecting assets:-*

Employees will act to use the Corporation's assets in a prudent manner and for the benefit of the Corporation and its shareholders while protecting the Corporation's assets, including cash, equipment, fixed assets, vehicles and intangible property (computer software programs, intellectual property and goodwill).

10. *Creating an equitable and supportive work environment:-*

As the Corporation faces global challenges and regulatory demands, our task is to increase our efforts towards sustainability in every field of our activities.

The Corporation undertakes to provide to all employees' equitable employment terms, to pay fair remuneration in accordance with the type of work, and to pay wages and social benefits in accordance with the relevant legislation.

#### *11. Conflict of interest:-*

The Corporation undertakes to make decisions for the best interests of the Corporation and not for any personal benefit. In any event of a conflict of interest or concern that a conflict of interest may exist between the Corporation's best interest and an employee's own benefit, the same will be reported to management prior to making a decision.

#### *12. Inducements:-*

An inducement is an object, situation, or action that is used as a means to influence another individual's behaviour. Inducements can range from minor acts of hospitality between business colleagues to acts that result in non-compliance with laws and regulations. An inducement can take many different forms, for example:-

- Gifts.
- Hospitality.
- Entertainment.
- Political or charitable donations.
- Appeals to friendship and loyalty.
- Employment or other commercial opportunities.
- Preferential treatment, rights or privileges.

#### *13. Gifts:-*

Employees will not accept, directly or indirectly, on their other's behalf, any gift, proposed recreation, vacation, service, loan or any other benefit from any person or business entity, with whom or with which they have entered into transactions within the framework of their capacity at the Corporation, except as permitted by management or the Corporation's procedures.

In addition, employees are prohibited from granting gifts to government public officials and their relatives, vendors or other third parties, except for small promotional or pre-approved gifts in accordance with the Corporation's policies and procedures.

#### *14. Conduct in Relation to Public Communication:-*

All public communications (e.g. speeches, press releases, speaking at conferences etc.) by any employee of the Corporation can only be made after the individual has received authorization from the appropriate authority.



#### *15. Personal Conduct:-*

All employees should ensure that they do not discriminate on the grounds of race, tribe, gender, religion, disability or illness.

Employees also have a personal responsibility, so far as is reasonably practicable, to ensure that they do not put the health and safety of others at risk by their actions.

Employees should arrange their personal financial affairs in such a way that they are able to live within their means. Borrowing from clients, financial delinquency or bankruptcy is prohibited.

#### *16. Conduct vis-à-vis the legal authorities:-*

Transmedia undertakes to submit full and accurate reports as required under law. Transmedia undertakes to fully cooperate in respect of any investigation or clarification on the part of the legal authorities vis-à-vis Transmedia.

#### *17. Contracting with suppliers and business associates:-*

Transmedia will act to contract with suppliers and business associates who will best meet the Corporation's needs. Transmedia undertakes to refrain from contracting with suppliers and business associates where the Corporation is aware that they do not comply with high standards of ethical conduct.

Any unauthorized outside work during office hours which conflicts the Corporation's business is considered as improper and constitutes grounds for disciplinary action. The employee should not use any official information in any outside work.

#### *18. Financial Reports:-*

Transmedia undertakes that all financial transactions will be approved in accordance with the approval hierarchy designated in the Corporation's procedures and required by law. Transmedia undertakes that all transactions as are required by law will be recorded fully and accurately in the Corporation's books and that the Corporation's accounting records will be carried out in accordance with the accounting principles governing the Corporation.

#### *19. Usage of IT systems:-*

Transmedia undertakes to use its Information Technology (IT) systems solely for work purposes in accordance with the Information Technology (IT) policy.

## *20. Creating an equitable and supportive work environment:-*

As we face global challenges and regulatory demands, our task is to increase our efforts towards sustainability in all our activities.

### *20.1 Equitable employment and work conditions:-*

Transmedia undertakes to provide to all employees with equitable employment terms, to pay fair remuneration in accordance with the type of work, and to pay wages and social benefits in accordance with the relevant legislation in the country.

### *20.2 Equal employment opportunities:-*

Transmedia undertakes to promote a cooperative and productive work environment. Transmedia will offer equal employment opportunities in recruitment, promotion, receipt of benefits and training to all employees and candidates for work, irrespective of race, colour, gender, religion, national origin, family status, age or disability.

## *21. Safety and hygiene:-*

The Corporation regards a safe and clean environment as an important contributing factor in the employees' welfare. Accordingly, Transmedia acts to comply with safety and hygiene standards in accordance with policies and relevant statutes.

## *22. Community involvement:-*

The Corporation acts in the community by supporting communal and social causes and by encouraging the participation of the Corporation's employees in activities which contribute to community welfare.

## *23. Environmental awareness:-*

Transmedia acts to conduct its business with maximum consideration for environment impact with a view to mitigating possible damage to the environment. The Corporation acts to protect the environment, to comply with high standards of safety and strict compliance with the Environmental Management Agency and any other international provisions of law relating to protecting the environment and natural resources.

#### *24. Prevention of Sexual harassment:-*

Sexual harassment and abuse are in total violation of the Corporation's policy. Sexual harassment and abuse constitute severe disciplinary offenses likely to result in dismissal, and furthermore constitute a criminal offense. Transmedia undertakes to act to implement everywhere the provisions of the law concerning the prevention of sexual harassment, with a view to uprooting this phenomenon. Sexual harassment should be reported at all levels without fear.

#### *25. Exercising judgement:-*

In exercising their judgment, employees shall take into account:

- a. The National Interest;
- b. The Public Benefit or Interest;
- c. Transmedia's interest;
- d. That Zimbabwean societies have their own mores and values which have to be recognized.

### **USING THE CODE OF ETHICS**

The Code of Ethics constitutes a summary of the norms of business conduct and the rules that must accompany and guide the activities of Transmedia and Transmedia employees. This Code is binding to all employees of the Corporation.

Employees must be well-versed in the Code and undertake to uphold it in full. It should be borne in mind that the Code of Ethics cannot cover all issues or situations which may have to be dealt with and the content thereof is added to a list of various policies, regulations and work procedures governing Transmedia and its' employees.

Employees shall comply with the Code. There might be circumstances where laws or regulations preclude employees from complying with certain parts of the Code. In such circumstances, those laws and regulations prevail, and the employees shall comply with all other parts of the Code.

In any event of concern regarding violation of any law, regulation, procedure or any of the provisions of the Code of Ethics, it is both possible and imperative to make a complaint which can be made anonymously the Corporation's whistle blower.

Failure to read the Code of Ethics does not exempt any employee from complying with all the rules prescribed by the Code, abiding by the various provisions of the law and complying with ZIM's procedures pertaining to such employee's work.

## **Non-Retaliation Policy**

Transmedia does not tolerate retaliation against anyone who in good faith reports a possible violation of law, code of ethics or other company policy or procedure, or who questions ongoing or proposed conduct, or who participates in an internal investigation. Retaliation can include demotion, transfer or termination. An employee who retaliates or attempts to retaliate against anyone who reports a concern or question, or who participates in an internal investigation, may be subject to disciplinary action including termination.

## **DUTY TO COMPLY WITH THE CODE OF ETHICS**

All employees shall observe the conditions of service and all company regulations. This code of Ethics is binding upon all employees and carries equal force as any other rules and regulations of the Corporation.