



# **POLICY MANUAL**

Corporate Governance, Compliance,  
Operations and Conduct Framework

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**ROADRAK GROUP (PTY) LTD**

Registration Number: 2025/515748/07

Version 1.0 | Effective March 2026

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## 2. DOCUMENT CONTROL

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<b>Prepared By</b>	ExCo Compliance Committee
<b>Reviewed By</b>	Legal & Operations Director
<b>Approved By</b>	Board of Directors
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<b>Document Owner</b>	Group CEO

# PART 1: FOUNDATIONAL FRAMEWORK

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## 4. Introduction

The ROADRAK GROUP Policy Manual ('the Manual') serves as the primary governance instrument defining the operational, ethical, and legal standards by which ROADRAK GROUP (PTY) LTD ('the Company') conducts its business. This internal framework is designed to ensure consistency across all projects, from major infrastructure developments to procurement and facilities management. It provides a structured environment that supports sustainable growth, effective risk management, and strategic tender readiness.

## 5. Company Overview

ROADRAK GROUP (PTY) LTD (Reg: 2025/515748/07) is a specialist South African provider of construction, engineering, infrastructure, and integrated support services. As a subsidiary of ROADRAK CORPORATE HOLDINGS (PTY) LTD (Reg: 2025/896051/07), the Company operates within a broader corporate ecosystem focused on providing end-to-end solutions in materials supply, roadworks, and procurement management. We are committed to contributing to the South African economy through ethical business practices and technical excellence.

## 6. Purpose, Scope and Application

This Manual applies to all directors, managers, full-time and part-time employees, contractors, consultants, and legal representatives of ROADRAK GROUP. Adherence to these policies is a condition of employment/engagement. Where subcontractors or suppliers are engaged, they are required to align their conduct with the ethical and safety standards stipulated herein.

## 8. Core Corporate Values

- **INTEGRITY:** Unwavering honesty in all project dealings and financial reporting.
- **SAFETY:** A zero-harm philosophy across all construction and site operations.
- **ACCOUNTABILITY:** Taking ownership of project delivery and compliance outcomes.
- **PROFESSIONALISM:** Maintaining a boardroom-quality standard in every client interaction.
- **COMPLIANCE:** Strict adherence to South African law and industry regulations.

## **PART 2: ETHICS AND CONDUCT**

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### **9. Code of Business Conduct Policy**

All ROADRAK personnel must conduct themselves with the highest degree of professionalism. This includes fair dealing with competitors, respectful workplace interactions, and the safeguarding of Company reputation. Discrimination, harassment, or any form of unlawful behaviour is strictly prohibited.

### **10. Anti-Bribery and Anti-Corruption Policy**

Consistent with the Prevention and Combating of Corrupt Activities Act (PRECCA), ROADRAK GROUP maintains a zero-tolerance policy regarding bribery. No employee or representative may offer, give, or receive any form of 'kickback', facilitation payment, or gift intended to influence a business decision or government action. All hospitality exceeding R2,500 must be declared in the Gift Register.

### **11. Conflict of Interest Policy**

Employees must avoid any situation where their personal interests conflict with those of ROADRAK. This includes related-party interests where family members are directors of supply-chain partners. Annual declarations of interest are mandatory for all management and procurement staff.

### **13. Whistleblowing and Protected Disclosure Policy**

ROADRAK encourages the reporting of irregularities. In accordance with the Protected Disclosures Act, employees who report concerns in good faith are protected from occupational detriment. Reports can be made via the designated internal compliance channel or the confidential email: [info@roadrak.co.za](mailto:info@roadrak.co.za).

## **PART 3: OPERATIONAL EXCELLENCE**

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### **14. Procurement and Supply Chain Policy**

Procurement at ROADRAK is governed by principles of transparency, competition, and cost-effectiveness. All purchases over R50,000 require a minimum of three competitive quotes. Preferred vendors are subject to annual B-BBEE and safety compliance audits.

### **15. Tendering and Bid Submission Policy**

As a primary revenue driver, the tender process is strictly controlled. All bid submissions must undergo a multi-level review covering technical feasibility, commercial risk, and legal compliance. Collusive tendering or fronting is a dismissible offence and will result in immediate termination of the offending party.

### **19. Vehicle, Plant and Equipment Use Policy**

Only authorized and licensed personnel may operate Company plant and vehicles. Mandatory daily pre-start inspections are required for all heavy machinery. Misuse of fuel cards or unauthorized personal use of vehicles is strictly forbidden.

## **PART 4: PEOPLE, HEALTH AND SAFETY**

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### **25. Health and Safety Policy**

In compliance with the Occupational Health and Safety Act (OHSA), the Company prioritizes the safety of its workforce above production. PPE is mandatory on all sites. Every project must begin with a formal Risk Assessment and 'Toolbox Talk'. Every employee has the 'Stop-Work Authority' if an unsafe condition is identified.

### **20. Human Resources and Employment Policy**

Recruitment is based on merit and the strategic requirements of the Company. All employees are issued with a formal contract of employment aligned with the Basic Conditions of Employment Act. Leave, attendance, and performance are managed through the centralized HR system.

### **29. Data Privacy and POPIA Policy**

ROADRAK GROUP respects the privacy of its stakeholders. All personal information (employee records, client data, supplier details) is processed in accordance with the Protection of Personal Information Act (POPIA). Data is stored securely, and access is restricted on a 'need-to-know' basis.

### **38. Disciplinary and Breach Management Policy**

Violations of this Manual will result in disciplinary action. Depending on the severity, this may include verbal warnings, written warnings, or summary dismissal. Criminal activities will be reported to the South African Police Service (SAPS) and relevant regulatory bodies.



## 42. APPROVAL PAGE

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By signing below, the authorized representative confirms that this Policy Manual has been formally adopted by the Company and all employees are expected to comply with its provisions.

**Approved By:**

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**Title:** Group CEO

**Signature:**

A handwritten signature in black ink, consisting of a large, stylized 'M' or 'W' shape followed by a horizontal line and a long, sweeping tail.

**Date:** \_\_\_\_\_

## 44. NOTES

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Space for additional internal operational notes or project-specific compliance requirements...