



national film and video foundation
SOUTH AFRICA

an agency of the Department of Sport, Arts and Culture

NATIONAL FILM AND VIDEO FOUNDATION

ETHICS CODE AND CONDUCT POLICY

OCTOBER 2025

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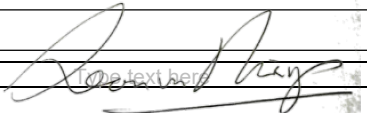
APPROVAL	
The signatories hereof, confirm their acceptance of the content and authorize the adopt the thereof	
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1. DEFINITIONS

The words and expressions listed hereunder are assigned the meanings described as follows:

1.1 Business

The business of the NFVF in terms of the National Film and Video Foundation Act 73 of 1997, as amended.

1.2 Beneficiary

Individual or business that has received funding from the NFVF and/or has an application pending.

1.3 Employee

An employee of the NFVF in the ordinary sense of the word and in accordance with Section 213 of the Labour Relations Act 66 of 1995, as amended and shall include, for purposes of this Policy, NFVF interns.

1.4 Ethics Code and Conduct Policy

The Ethics Code and Conduct (ECC) Policy as set out in this document, including all annexures and/or schedules thereto.

1.5 Gifts

Items and services of value which are given to any outside parties, but do not include items described hereunder:

1.5.1 Customary business entertainment items such as meals and beverages are not to be considered "gifts."

1.5.2 Items of minimal value, given in connection with sales campaigns, promotions or employee services, safety or retirement awards are not to be considered "gifts" for purposes of this Policy; and

1.5.3 Contributions or donations to recognised charitable and non-profit organisations are not considered "gifts."

1.6 Management

Persons responsible for planning, directing and controlling the activities of the NFVF, including those charged with the governance of the NFVF in accordance with legislation, in instances where they are required to perform such functions.

Management personnel include:

- 1.6.1 All NFVF Council members and members of sub-committees of Council;
- 1.6.2 Chief Executive Officer;
- 1.6.3 Chief Financial Officer;
- 1.6.4 Heads of Department;
- 1.6.5 Managers

1.7 Members of the family of a person

A spouse, partner or close family member who may have any matter before the NFVF.

1.8 NFVF

The National Film and Video Foundation, established in terms of the National Film and Video Foundation Act 73 of 1997.

1.9 NFVF anti-corruption and anti-bribery policies

The NFVF policies that deal with fraud and corruption prevention measures, which include but are not limited to the Funding Policy, Human Resources (HR) Manual, Conflict-of-Interest Policy, Gifts and Hospitality Declaration Policy, Ethics Code and Conduct Policy, Code of Conduct and Ethics for Employees and the Fraud Prevention Plan.

1.10 Official

Any person in the employ of the NFVF, including council members, members of Council sub-committees (including panel members), managers and employees.

1.11 Supplier

Not only vendors providing goods, services and/or material to the NFVF, but also consultants, financial institutions, advisors, service providers and any person or institution which does business with the NFVF and/or has received funding (i.e., a

grant) from the NFVF.

2. PREAMBLE

- The Ethics Code and Conduct Policy is derived from an existing framework of guidelines regulating ethics, good governance and integrity in the public sector (2016 Public Service Regulations). The Ethics Code and Conduct Policy aims to help protect the integrity of the South African Government and raise public confidence in the institutions of the State, such as the NFVF.
- It aims to strengthen the minimum ethical standards of behavior expected of NFVF council members, panel members, employees and independent contractors, including upholding respectability, integrity and ethical values in their conduct.
- To give practical effect to the relevant frameworks relating to public services, all NFVF council members, panel members, employees and independent contractors are expected to comply with the Ethics Code and Conduct Policy.
- The Ethics Code and Conduct Policy must be read together with the NFVF's Conflict of Interest Policy, anti-corruption and anti-bribery policies, Finance Manual, Human Resource Manual, Funding Policy, HR Manual and the Gifts and Hospitality Declaration Policy.

3. SCOPE AND APPLICABILITY OF THIS POLICY

The Ethics Code and Conduct Policy is applicable to all NFVF officials. These officials include but are not limited to council members, panel members, employees, and independent contractors.

4. ETHICAL VALUES

All NFVF officials must adhere to the following conduct:

4.1 Selflessness:

- 4.1.1 We make decisions in the best interests of NFVF. We must take or make decisions solely in terms of the advancement of the business of the NFVF, the public interest and without regard to personal

financial or other material benefits for themselves or members of their family, their business partners, or their friends.

4.2 Integrity:

4.2.1 We must avoid placing ourselves under any financial or other obligation to any outside individual or organization where this creates a conflict or potential conflict of interest (as defined in the NFVF's Conflict of Interest Policy) with his or her role as an official of the NFVF;

4.2.2 We refrain from disclosing any official information for personal gain to our immediate family, our business partners, our friends or to the media; and

4.2.3 We must not use the NFVF time, materials, information, or other assets in connection with any outside employment whatsoever.

4.3 Objectivity:

4.3.1 In carrying out the business of the NFVF, we must do so only based on merit, in accordance with the mandate of the NFVF and the approved strategic plans of the business of the NFVF.

4.4 Openness:

4.4.1 We should strive to be transparent about all decisions and actions, bearing in mind the constitutional obligation for openness and transparency; and

4.4.2 We must always recognise the public's right to access to information.

4.5 Honesty:

We must declare private interests relating to public duties and resolve any conflict arising in a way that protects the public interest and the NFVF's

stakeholders.

4.6 Leadership:

4.6.1 We must promote and support ethical conduct by leadership and lead by example; and

4.6.2 Refrain from party political activities in the workspace.

4.7 Accountability:

4.7.1 We must be honest and accountable in all our dealings with public funds;

4.7.2 We must use the NFVF's property and other resources effectively, efficiently, and primarily for authorized official purposes; and

4.7.3 Promote sound, efficient, effective, transparent and accountable administration.

5. ETHICAL DECISION MAKING

5.1 Ethical conduct is a value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal.

Ask yourself:

- Is what I am doing legal?
- Does it reflect the NFVF's values and ethics?
- Does it comply with the Code and NFVF's rules/policies?
- Does it respect the rights of others?
- How would it potentially compromise the organisation or myself if it made the news headlines?
- Am I exercising loyalty towards and respect for the NFVF or am I only considering my personal interests?
- Is this the right thing to do?
- What would I tell my child to do?
- Have I been asked to misrepresent information or deviate from normal procedure?

6. COMPLIANCE WITH LAWS AND REGULATIONS

- 6.1** The NFVF is committed to integrity, which begins with complying with laws, rules and regulations.
- 6.2** NFVF officials must adhere to the relevant laws, legislation and regulations, including the Ethics Code of Conduct Policy at all times to ensure compliant operation.
- 6.3** The NFVF is committed to respecting the human dignity and rights of each individual, both internal and external stakeholders whom we interact with during the course of work. The NFVF shall not, in any way, cause or contribute to the violation of human rights.
- 6.4** All officials of the NFVF shall treat everybody with dignity, respect and care and uphold human rights.
- 6.5** The NFVF shall be committed to promote equality in employment practices and to fair employment and remuneration policy in compliance with applicable laws. We condemn all forms of illegal, unfair and unethical labour practices that exploit the workforce, destroys social security or serves as tax evasion.
- 6.6** NFVF officials are expected to act with integrity and treat their colleagues and others through the work with full respect.
- 6.7** The NFVF shall provide equal opportunity in employment, and we do not tolerate any form of discrimination, harassment or abuse. Direct or indirect discrimination based on nonprofessional traits or circumstances, such as gender, marital status, age, national, social or ethnic origin, colour, religion, political opinion, disability, sexual orientation, employee representation, property, birth, or other status is strictly prohibited. Any kind of discriminatory behaviour, harassment, bullying or victimization will not be tolerated.
- 6.8** NFVF officials are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect. They must refrain from any form of harassment, slander or behaviour that could be considered as offensive, intimidating, humiliating, malicious or insulting.
- 6.9** The NFVF shall provide clean, safe and healthy work conditions and maintaining a healthy environment.
- 6.10** NFVF officials must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.
- 6.11** The NFVF is responsible for the security, protection and for the economic use of company resources. Our resources, including time, materials,

equipment and information are provided for legitimate business use only.

- 6.12** NFVF officials are obliged to follow appropriate security measures, and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.
- 6.13** The NFVF is dedicated to maintaining confidentiality, integrity and accessibility of business information. We implement proper technical security measures, and it is the obligation of NFVF officials to uphold this. Proprietary information includes all non-public information that might be harmful to the NFVF or its stakeholders, if disclosed to unauthorised parties. All officials must handle any such information as secret. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed at all times.
- 6.14** The NFVF respects the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information through improper means. Unauthorized use, copying, distribution or alteration of software or other protected intellectual property is prohibited.
- 6.15** The NFVF's books, records, accounts and financial statements must be maintained in appropriate detail, to accurately reflect our transactions. We condemn all forms of money laundering, and we are committed to doing business with stakeholders involved in legitimate business activities with funds derived from legitimate sources.
- 6.16** The NFVF commits to fair taxation and to avoid all tax evasion practices, such as failing to issue receipts or accounting for fake expense invoices.
- 6.17** All officials must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and ensure that all disclosures made in financial reports are full, honest, accurate, timely and understandable.
- 6.18** All officials must not improperly influence, manipulate or mislead any audit.

7. ACCEPTANCE OF GIFTS, HOSPITALITY AND OTHER BENEFITS.

The NFVF prohibits the improper acceptance by officials of gifts and/or hospitality and other unsolicited benefits.

(See further the NFVF's Gifts and Hospitality Declaration Policy)

8. ANTI-CORRUPTION AND ANTI-BRIBERY MEASURES

The Solicitation of bribes, directly or indirectly accepting or agreeing to accept any gratification from another person; giving or agreeing to give any other person any gratification in order to influence that person directly or indirectly to exercise their powers, duties or legal obligations in a manner for the benefit of any person is prohibited by the Prevention and Combating of Corrupt Activities Act, No.12 of 2004, the Public Finance Management Act, No. 1 of 1999 and the NFVF's anti-corruption and anti-bribery policies. This behaviour amounts to misconduct and is a punishable offense.

8.1 No NFVF official shall directly or indirectly pay, offer, give or promise to pay or authorise the payment of any portion of the compensation or reimbursements received hereunder or any other monies or other things of value to:

- 8.1.1 an officer or employee of a government department or government agency; or
- 8.1.2 any organisation to whom the NFVF may introduce the Supplier or Beneficiary to; or
- 8.1.3 any political party or official thereof or candidate for political office; or
- 8.1.4 any sub-contractor or supplier or partner of the NFVF;
- 8.1.5 any other person at the suggestion, request or direction of or for the benefit of any of the above-described persons and entities, for the purposes of influencing official actions or decisions or securing any improper advantage in order to obtain or retain business with the NFVF or engage in acts or transactions otherwise in violation of any applicable anti-- bribery legislation of the Republic.

8.2 The NFVF shall terminate any agreement with any Supplier or Beneficiary if a Supplier, Beneficiary or any member thereof, and/or any Official of the NFVF is found to have contravened any of the NFVF's anti-corruption and anti-bribery policies.

9. CONFLICT OF INTEREST

Members of the council, committees, advisory panels, employees and independent contractors as well as funding applicants are subject to various legal obligations in terms of the National Film and Video Foundation Act 73 of 1997 (NFVF Act) and the Public Finance Management Act 1 of 1999 (PFMA) where conflicts of interest arise. These individuals are required to declare any interests, whether financial or otherwise, held in any company that has submitted an application for assessment.

(See further the NFVF's Conflict of Interest Policy)

10. CONFIDENTIAL INFORMATION AND PRIVACY OF COMMUNICATIONS

The NFVF, in accordance with its policies and frameworks, including the Access to Information Manual as per the Promotion of Access to Information Act, No. 2 of 2000 (PAIA Act), Promotion of Administrative Justice Act, No. 3 of 2000, Protection of Information Act, No. 84 of 1982, Protection of Personal Information Act, No. 4 of 2013, protects the integrity of the NFVF's confidential information which must not be divulged except in strict accordance with established NFVF policies and procedures. This obligation exists during and continues after employment with and/or engagement by the NFVF.

The NFVF respects people's privacy and acknowledges stakeholders, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to complying with all personal data protection laws. We only acquire and keep personal information that is necessary, and we provide proper information on these activities to data owners. We implement proper security measures to the confidentiality, integrity and availability of personal information.

NFVF officials must observe the legal requirements, apply compliant practices and follow related procedures to ensure the legality of personal data handling and processing activities.

11. COMPLIANCE

All NFVF officials shall sign a declaration annually, confirming that they have read and understood this, Policy. The responsibility to ensure that declarations are signed and filed vests with the Human Resources Department and for Council and its sub-committee members, it vests with the Company Secretary.

12. MISCONDUCT

The NFVF must in terms of the Human Resources Manual take disciplinary action against any official who fails to follow the NFVF's anti-corruption and anti-bribery policies for misconduct. The NFVF must report the misconduct to the South African Police Services for criminal investigations.

13. REGULAR REVIEW

This Policy shall be reviewed every three (3) years, or such other shorter intervals as and when is necessary. Any changes thereto must be approved by the NFVF's Council before coming into effect.