

SASBO

The Finance Union

LEGAL, RISK AND COMPLIANCE POLICIES

Chapter 8 of the Comprehensive Policy Framework

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TABLE OF CONTENTS

1. INTRODUCTION	4
1.1 Policy Framework Objectives	4
1.2 Constitutional Basis	4
1.3 Policy Hierarchy	4
2. LEGAL FRAMEWORK POLICIES	5
2.1 Legal Compliance Management Framework	5
2.2 Contract Management and Review Policy	6
2.3 Litigation Management Policy	8
2.4 Legal Service Provider Engagement Policy	9
2.5 Intellectual Property Management Policy	11
3. RISK MANAGEMENT POLICIES.....	13
3.1 Enterprise Risk Management Framework.....	13
3.2 Risk Assessment and Treatment Policy.....	14
3.3 Risk Appetite and Tolerance Statement.....	15
3.4 Risk Reporting and Escalation Procedures.....	17
3.5 Insurance Management Policy	18
3.6 Business Continuity Management Policy	19
4. REGULATORY COMPLIANCE POLICIES	21
4.1 Labour Relations Act (LRA) Compliance Policy.....	21
4.2 Basic Conditions of Employment Act (BCEA) Compliance Policy	22
4.3 Employment Equity Act (EEA) Compliance Policy.....	23
4.4 Skills Development Act Compliance Policy	25
4.5 B-BBEE Act Compliance Policy	26
4.6 Protection of Personal Information Act (POPIA) Compliance Framework	27
4.7 Promotion of Access to Information Act (PAIA) Compliance Policy and Manual.....	29
4.8 Information Access Request Evaluation Policy	30
4.9 Mandatory Disclosure and Proactive Transparency Policy	31
4.10 Prevention and Combating of Corrupt Activities Act (PRECCA) Compliance Policy	33
4.11 Financial Intelligence Centre Act (FICA) Compliance Policy	34
4.12 Tax Law Compliance Policy	35
4.13 Occupational Health and Safety Act (OHSA) Compliance Policy	36
4.14 Compensation for Occupational Injuries and Diseases Act (COIDA) Compliance Policy	37
4.15 Registrar of Labour Relations Reporting and Compliance Policy	39
4.16 Immigration Act Compliance Policy.....	40
4.17 Employment Services Act Compliance Policy.....	42
5. ETHICS AND INTEGRITY POLICIES.....	45
5.1 Code of Ethics and Conduct.....	45
5.2 Fraud Prevention and Detection Policy	46

5.3 Whistleblowing and Protected Disclosures Policy.....	48
5.4 Anti-Bribery and Corruption Policy	49
5.5 Gift and Hospitality Policy.....	50
5.6 Conflict of Interest Management Policy.....	51
6. POLICY GOVERNANCE AND REVIEW.....	54
6.1 Policy Ownership and Custodianship.....	54
6.2 Review Cycle.....	54
6.3 Amendment Procedures.....	54
6.4 Training and Communication	54
7. DOCUMENT APPROVAL	56

1. INTRODUCTION

This document constitutes Chapter 8 of the SASBO Comprehensive Policy Framework, encompassing all Legal, Risk and Compliance Policies required to ensure the union operates within the bounds of South African law, manages its risks prudently, and upholds the highest standards of ethical conduct.

As an organisation registered under the Labour Relations Act, No. 66 of 1995, SASBO is subject to a broad legislative compliance landscape. These policies ensure adherence to all applicable statutes whilst protecting the interests of members and maintaining the integrity of union operations.

1.1 Policy Framework Objectives

The Legal, Risk and Compliance Policies serve to:

- (a) Establish a comprehensive legal compliance management framework aligned to the SASBO Constitution and all applicable South African legislation.
- (b) Implement enterprise risk management practices that identify, assess, and mitigate risks to the union's operations, reputation, and member interests.
- (c) Ensure regulatory compliance across all domains including labour law, employment equity, data protection, financial intelligence, and occupational health and safety.
- (d) Promote a culture of ethics and integrity through clear standards of conduct, fraud prevention mechanisms, and protected disclosure procedures.

1.2 Constitutional Basis

These policies are grounded in the SASBO Constitution (Certified 19 February 2019) and give operational effect to the constitutional mandate to conduct the affairs of the union in accordance with law and best practice. Specific constitutional references are provided within each policy instrument where applicable.

1.3 Policy Hierarchy

The policies contained herein form part of the hierarchical governance structure: NEC > MANCOM > General Secretary > Branch Executive Committees. No policy may contradict the provisions of the SASBO Constitution. In the event of any conflict between these policies and the Constitution, the Constitution shall prevail.

2. LEGAL FRAMEWORK POLICIES

This section establishes the framework for legal compliance management, contract administration, litigation oversight, and the engagement of legal service providers. These policies ensure that SASBO's legal affairs are conducted with due diligence and in accordance with best practice.

2.1 Legal Compliance Management Framework

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish a structured approach to identifying, monitoring, and ensuring compliance with all laws, regulations, and legal requirements applicable to SASBO's operations as a registered trade union.

2. Scope

This framework applies to all SASBO operations, structures, office bearers, staff, and activities conducted in the name of the union across all branches and institutional councils.

3. Constitutional References

Clause 3.1 (objects of the union), Clause 12.1.5 (NEC power to institute legal proceedings), Clause 8 (legal representation of members).

4. Regulatory and Legislative References

Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998; Protection of Personal Information Act 4 of 2013; Promotion of Access to Information Act 2 of 2000; Prevention and Combating of Corrupt Activities Act 12 of 2004; Financial Intelligence Centre Act 38 of 2001; Occupational Health and Safety Act 85 of 1993; Compensation for Occupational Injuries and Diseases Act 130 of 1993; National Minimum Wage Act 9 of 2018; Cyber Crimes Act 19 of 2020; Immigration Act 13 of 2002; Employment Services Act 4 of 2014.

5. Policy Statements

- SASBO shall maintain a comprehensive legal compliance register identifying all applicable legislation, regulations, and legal requirements.
- The General Secretary shall be responsible for the overall coordination of legal compliance activities and shall report to MANCOM on compliance status quarterly.
- Each department and branch shall identify a compliance champion responsible for monitoring compliance within their area of responsibility.
- Legal compliance requirements shall be integrated into operational planning, policy development, and decision-making processes.

- SASBO shall conduct annual legal compliance audits to assess the effectiveness of compliance measures and identify areas requiring improvement.
- All staff and office bearers shall receive appropriate training on legal compliance requirements relevant to their roles.
- Non-compliance with legal requirements shall be treated as a serious matter and may result in disciplinary action in accordance with the applicable disciplinary code.

6. Roles and Responsibilities

- **MANCOM:** Provides oversight of legal compliance and approves the annual compliance plan and budget.
- **General Secretary:** Serves as the Chief Compliance Officer with overall responsibility for legal compliance management.
- **Assistant General Secretary:** Supports the General Secretary in compliance monitoring and reporting.
- **Branch Secretaries:** Ensure compliance within their respective branches and report compliance matters through established channels.
- **All Staff and Office Bearers:** Comply with all applicable laws and report potential compliance issues promptly.

7. Monitoring and Compliance

Compliance shall be monitored through quarterly compliance reports to MANCOM, annual compliance audits, incident reporting and tracking, and regular review of the compliance register. Key compliance indicators shall be established and tracked.

8. Review Frequency

This framework shall be reviewed annually or upon significant legislative changes, whichever occurs first.

2.2 Contract Management and Review Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish procedures for the negotiation, review, approval, execution, and management of contracts entered into by SASBO, ensuring that all contractual arrangements protect the union's interests and comply with applicable law.

2. Scope

This policy applies to all contracts and agreements entered into by SASBO, including but not limited to service agreements, employment contracts, lease agreements, vendor contracts, memoranda of understanding, and collective agreements.

3. Constitutional References

Clause 13.8.2 (MANCOM power to acquire and dispose of property), Clause 13.8.6 (MANCOM power to enter contracts).

4. Regulatory and Legislative References

Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002; National Credit Act 34 of 2005; common law of contract.

5. Policy Statements

- All contracts shall be in writing and shall clearly set out the rights and obligations of all parties.
- Contracts exceeding the value of R100,000 or with a duration exceeding 12 months shall require MANCOM approval prior to execution.
- All contracts shall be subject to legal review before execution. Contracts exceeding R500,000 or involving significant risk shall be reviewed by external legal counsel.
- A central contract register shall be maintained recording all contracts, their key terms, expiry dates, and renewal provisions.
- Contract signatories shall be limited to persons with delegated authority as specified in the Delegation of Authority Framework.
- Standard contract templates shall be developed and maintained for routine contractual arrangements.
- Contracts shall include appropriate clauses addressing confidentiality, data protection, dispute resolution, and termination rights.
- Contract performance shall be monitored throughout the contract term and documented in the contract register.

6. Roles and Responsibilities

- **MANCOM:** Approves contracts above threshold values and contracts of strategic significance.
- **General Secretary:** Primary authority for contract negotiation and execution within delegated limits; maintains the contract register.
- **Assistant General Secretary:** Reviews contracts for compliance with policy and manages day-to-day contract administration.
- **Finance Department:** Reviews contracts for financial implications and budget alignment.

- **Legal Advisors:** Provide legal review and advice on contractual matters.

7. Monitoring and Compliance

Contract compliance shall be monitored through the contract register, periodic contract audits, performance reviews against contract deliverables, and tracking of contract renewals and terminations.

8. Review Frequency

This policy shall be reviewed every two years or upon significant changes to contracting legislation.

2.3 Litigation Management Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish procedures for managing litigation involving SASBO, whether as plaintiff or defendant, and for representing members in legal proceedings in accordance with the union's constitutional mandate.

2. Scope

This policy applies to all litigation matters involving SASBO, including civil proceedings, labour disputes, arbitrations, and matters before the CCMA, Labour Court, and other tribunals. It also governs the provision of legal representation to members under Clause 8 of the Constitution.

3. Constitutional References

Clause 8 (legal representation of members), Clause 12.1.5 (NEC power to institute legal proceedings on behalf of members).

4. Regulatory and Legislative References

Labour Relations Act 66 of 1995; CCMA Rules; Labour Court Rules; Attorneys Act 53 of 1979; Legal Practice Act 28 of 2014; Contingency Fees Act 66 of 1997.

5. Policy Statements

- SASBO shall institute or defend legal proceedings only where there is reasonable prospect of success and where doing so serves the interests of members or the union.
- All decisions to institute legal proceedings shall be approved by MANCOM or, in urgent matters, by the General Secretary with subsequent ratification by MANCOM.
- Member legal representation shall be provided in accordance with the criteria set out in Clause 8 of the Constitution, subject to the member being in good standing.
- A litigation register shall be maintained recording all active and concluded matters, legal costs incurred, and outcomes achieved.

- Legal service providers shall be engaged in accordance with the Legal Service Provider Engagement Policy.
- Settlement of claims shall be approved by MANCOM where the settlement value exceeds R50,000 or involves admission of liability.
- Litigation costs shall be monitored and reported to MANCOM quarterly.
- Lessons learned from concluded litigation shall be documented and used to improve risk management and compliance practices.

6. Roles and Responsibilities

- **MANCOM:** Approves institution of proceedings, settlement of claims, and litigation strategy.
- **General Secretary:** Manages day-to-day conduct of litigation, instructs legal service providers, and maintains the litigation register.
- **Legal Service Providers:** Provide legal advice and representation in accordance with their terms of engagement.
- **Branch Secretaries:** Refer member matters requiring legal assistance through established channels.
- **Finance Department:** Monitors litigation expenditure against budget.

7. Monitoring and Compliance

Litigation shall be monitored through the litigation register, quarterly reports to MANCOM on active matters, tracking of legal costs against budget, and post-matter reviews of concluded litigation.

8. Review Frequency

This policy shall be reviewed every two years or upon significant changes to litigation procedures or constitutional provisions.

2.4 Legal Service Provider Engagement Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish procedures for the selection, appointment, and management of legal service providers engaged to provide legal services to SASBO and its members.

2. Scope

This policy applies to the engagement of all external legal service providers, including law firms, advocates, legal consultants, and other persons or entities providing legal services to SASBO.

3. Constitutional References

Clause 8 (legal representation of members), Clause 13.8.6 (MANCOM power to enter contracts).

4. Regulatory and Legislative References

Legal Practice Act 28 of 2014; B-BBEE Act 53 of 2003; Preferential Procurement Policy Framework Act 5 of 2000.

5. Policy Statements

- SASBO shall maintain a panel of approved legal service providers selected through a competitive process.
- Legal service providers shall be selected based on expertise, experience, track record, fee competitiveness, transformation credentials, and alignment with SASBO values.
- Preference shall be given to legal service providers with B-BBEE Level 2 or better certification, in accordance with the Supply Chain Management Policy.
- All legal service providers shall enter into written engagement agreements specifying scope of services, fee arrangements, reporting requirements, and performance standards.
- Fee arrangements shall be negotiated to achieve value for money and may include fixed fees, capped fees, or contingency arrangements where appropriate.
- Legal service provider performance shall be evaluated annually against agreed criteria.
- Conflicts of interest shall be declared and managed in accordance with the Conflict of Interest Management Policy.
- Legal service providers shall maintain appropriate professional indemnity insurance and provide evidence thereof upon request.

6. Roles and Responsibilities

- **MANCOM:** Approves the panel of legal service providers and major engagements exceeding R200,000.
- **General Secretary:** Manages relationships with legal service providers and evaluates performance.
- **Assistant General Secretary:** Coordinates legal service provider engagement and maintains engagement records.
- **Finance Department:** Processes legal fee invoices and tracks expenditure against budget.

7. Monitoring and Compliance

Legal service provider performance shall be monitored through annual performance evaluations, tracking of matter outcomes and costs, feedback from internal stakeholders, and review of billing practices.

8. Review Frequency

This policy shall be reviewed every two years. The legal service provider panel shall be refreshed every three years through a competitive process.

2.5 Intellectual Property Management Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish procedures for the protection, management, and appropriate use of SASBO's intellectual property assets, including trademarks, copyright materials, and proprietary information.

2. Scope

This policy applies to all intellectual property owned by or licensed to SASBO, including the SASBO name and logo, publications, educational materials, software, databases, and other proprietary assets.

3. Constitutional References

Clause 26 (union badge and name).

4. Regulatory and Legislative References

Trade Marks Act 194 of 1993; Copyright Act 98 of 1978; Patents Act 57 of 1978; Counterfeit Goods Act 37 of 1997.

5. Policy Statements

- The SASBO name, badge, and logo are the exclusive property of the union and shall only be used in accordance with approved brand guidelines.
- All intellectual property created by staff in the course of employment shall vest in SASBO.
- SASBO shall maintain appropriate trademark registrations for its name, badge, and logo.
- Third-party use of SASBO intellectual property shall require written approval from the General Secretary.
- Staff and office bearers shall respect third-party intellectual property rights and shall not use unlicensed software or reproduce copyrighted materials without authorisation.
- Alleged infringement of SASBO intellectual property shall be investigated and, where appropriate, legal action shall be taken to protect SASBO's rights.
- An intellectual property register shall be maintained documenting SASBO's intellectual property assets, registrations, and licensing arrangements.

6. Roles and Responsibilities

- **MANCOM:** Approves intellectual property strategy and major licensing arrangements.
- **General Secretary:** Manages intellectual property portfolio and authorises third-party use.
- **Communications Department:** Ensures compliance with brand guidelines and monitors unauthorised use.
- **IT Department:** Ensures software licensing compliance.

7. Monitoring and Compliance

Intellectual property shall be monitored through the intellectual property register, periodic brand audits, monitoring of potential infringement, and tracking of registration renewals.

8. Review Frequency

This policy shall be reviewed every three years or upon significant changes to intellectual property legislation.

3. RISK MANAGEMENT POLICIES

This section establishes the framework for enterprise risk management, ensuring that SASBO identifies, assesses, and manages risks to its operations, reputation, and member interests in a systematic and proactive manner.

3.1 Enterprise Risk Management Framework

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish a comprehensive enterprise risk management framework that enables SASBO to identify, assess, treat, and monitor risks across all areas of operation.

2. Scope

This framework applies to all SASBO operations, structures, and activities. It encompasses strategic, operational, financial, compliance, and reputational risks.

3. Constitutional References

Clause 13 (MANCOM fiduciary responsibilities), Clause 13.8 (MANCOM powers relating to assets).

4. Regulatory and Legislative References

King IV Report on Corporate Governance; ISO 31000:2018 Risk Management Guidelines.

5. Policy Statements

- SASBO shall adopt a proactive and systematic approach to risk management, integrated into strategic planning, decision-making, and operational processes.
- Risk management shall be the responsibility of all staff and office bearers, with leadership setting the tone from the top.
- A risk register shall be maintained identifying all material risks, their likelihood, impact, controls, and risk owners.
- Risks shall be assessed using a consistent methodology based on likelihood and impact, with residual risk evaluated after considering existing controls.
- Risk appetite and tolerance levels shall be established by MANCOM and shall guide risk treatment decisions.
- Material risks shall be reported to MANCOM quarterly, with emerging risks escalated promptly.
- Risk management activities shall be subject to periodic independent review.

- A risk-aware culture shall be fostered through training, communication, and integration of risk considerations into performance management.

6. Roles and Responsibilities

- **MANCOM:** Sets risk appetite, approves the risk management framework, and provides oversight of risk management.
- **General Secretary:** Serves as Chief Risk Officer with overall responsibility for risk management.
- **Risk Champions:** Identified in each department and branch to monitor risks and implement controls.
- **Internal Audit (where applicable):** Provides independent assurance on risk management effectiveness.
- **All Staff and Office Bearers:** Identify and report risks and implement controls within their areas of responsibility.

7. Monitoring and Compliance

Risk management shall be monitored through quarterly risk reports to MANCOM, annual review of the risk register, key risk indicator tracking, incident reporting and analysis, and periodic internal audit reviews.

8. Review Frequency

This framework shall be reviewed annually or upon significant changes to SASBO's risk profile.

3.2 Risk Assessment and Treatment Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish the methodology for assessing and treating risks identified within SASBO's operations.

2. Scope

This policy applies to all risk assessment and treatment activities conducted across SASBO.

3. Regulatory and Legislative References

ISO 31000:2018 Risk Management Guidelines; King IV Report on Corporate Governance.

4. Policy Statements

- All identified risks shall be assessed using a standardised risk assessment matrix based on likelihood (1-5 scale) and impact (1-5 scale).

- Risk categories shall include: financial impact, operational disruption, reputational damage, legal and compliance exposure, and member impact.
- Inherent risk (before controls) and residual risk (after controls) shall be assessed and documented.
- Risks shall be categorised as Critical (score 20-25), High (score 12-19), Medium (score 6-11), or Low (score 1-5).
- Risk treatment options shall include: avoid (eliminate the activity), mitigate (implement controls), transfer (insurance or contract), or accept (within risk appetite).
- Critical and High risks shall require documented treatment plans with assigned owners and target completion dates.
- Risk assessments shall be conducted for all significant projects, initiatives, and decisions.
- The effectiveness of risk treatments shall be monitored and evaluated on an ongoing basis.

5. Roles and Responsibilities

- **MANCOM:** Approves treatment strategies for Critical risks.
- **General Secretary:** Approves treatment strategies for High risks and oversees implementation.
- **Risk Champions:** Conduct risk assessments and implement treatment plans within their areas.
- **All Staff:** Participate in risk identification and assessment activities.

6. Monitoring and Compliance

Risk assessments shall be reviewed quarterly for Critical and High risks, and annually for Medium and Low risks. Treatment plan implementation shall be tracked and reported to MANCOM.

7. Review Frequency

This policy shall be reviewed annually alongside the Enterprise Risk Management Framework.

3.3 Risk Appetite and Tolerance Statement

- **Policy Owner:** MANCOM
- **Approval Authority:** NEC

1. Purpose

To articulate SASBO's risk appetite and tolerance levels across key risk categories, guiding decision-making and risk treatment.

2. Scope

This statement applies to all risk-related decisions across SASBO.

3. Constitutional References

Clause 13 (MANCOM fiduciary responsibilities).

4. Regulatory and Legislative References

King IV Report on Corporate Governance.

5. Policy Statements

- **Strategic Risk:** SASBO has a moderate appetite for strategic risk where necessary to fulfil its constitutional mandate and advance member interests, provided such risks are carefully evaluated and managed.
- **Operational Risk:** SASBO has a low appetite for operational risks that could disrupt service delivery to members or compromise operational integrity.
- **Financial Risk:** SASBO has a low appetite for financial risks that could threaten the union's financial sustainability or ability to meet obligations to members.
- **Compliance Risk:** SASBO has zero tolerance for deliberate non-compliance with legal and regulatory requirements.
- **Reputational Risk:** SASBO has a very low appetite for reputational risk, recognising the importance of trust and credibility to member relationships and stakeholder confidence.
- **Member Impact Risk:** SASBO has zero tolerance for risks that could result in direct harm to members.
- Risk appetite shall be considered in all significant decisions and shall guide resource allocation for risk management.
- Risk appetite and tolerance levels shall be reviewed annually by MANCOM and approved by the NEC.

6. Roles and Responsibilities

- **NEC:** Approves the Risk Appetite and Tolerance Statement.
- **MANCOM:** Develops and recommends risk appetite levels and ensures operational alignment.
- **General Secretary:** Communicates risk appetite across the organisation and monitors adherence.

All Decision-Makers: Consider risk appetite when making decisions involving risk.

7. Monitoring and Compliance

Adherence to risk appetite shall be monitored through quarterly risk reports, incident tracking, and review of decisions involving significant risk.

8. Review Frequency

This statement shall be reviewed annually and approved by the NEC, or more frequently if SASBO's circumstances change materially.

3.4 Risk Reporting and Escalation Procedures

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish clear procedures for reporting risks and escalating risk matters requiring management attention.

2. Scope

This policy applies to all risk reporting and escalation activities across SASBO.

3. Regulatory and Legislative References

King IV Report on Corporate Governance.

4. Policy Statements

- All staff and office bearers have a duty to report identified risks promptly through established channels.
- Risk reports shall include: risk description, risk category, likelihood and impact assessment, existing controls, recommended actions, and risk owner.
- The General Secretary shall compile quarterly risk reports for MANCOM, including the status of critical and high risks, emerging risks, and control effectiveness.
- Critical risks shall be escalated to the General Secretary immediately upon identification, and to MANCOM within 24 hours.
- High risks shall be escalated to the General Secretary within 48 hours and reported to MANCOM at the next scheduled meeting or earlier if warranted.
- Emerging risks with potential to become critical shall be escalated promptly regardless of current assessment.
- Risk incidents (materialised risks) shall be reported and investigated in accordance with incident management procedures.
- Anonymous risk reporting channels shall be available and shall be protected in accordance with the Whistleblowing Policy.

5. Roles and Responsibilities

- **All Staff and Office Bearers:** Report risks through established channels.
- **Risk Champions:** Consolidate and escalate risks from their areas.
- **General Secretary:** Receives escalations, compiles risk reports, and escalates to MANCOM.
- **MANCOM:** Receives and reviews quarterly risk reports and critical risk escalations.

6. Monitoring and Compliance

Risk reporting and escalation shall be monitored through tracking of reported risks, escalation response times, and completeness of quarterly risk reports.

7. Review Frequency

This policy shall be reviewed annually alongside the Enterprise Risk Management Framework.

3.5 Insurance Management Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish procedures for managing SASBO's insurance portfolio, ensuring appropriate coverage of insurable risks.

2. Scope

This policy applies to all insurance arrangements entered into by SASBO.

3. Constitutional References

Clause 13.8 (MANCOM powers relating to assets).

4. Regulatory and Legislative References

Short-term Insurance Act 53 of 1998; Long-term Insurance Act 52 of 1998; Financial Advisory and Intermediary Services Act 37 of 2002.

5. Policy Statements

- SASBO shall maintain appropriate insurance coverage for all material insurable risks, including property, liability, business interruption, and professional indemnity.
- Insurance coverage shall be reviewed annually to ensure adequacy in relation to risk exposures and asset values.
- Insurance shall be placed with reputable insurers with appropriate financial strength ratings.

- An insurance broker may be engaged to provide advice and placement services, subject to the Legal Service Provider Engagement Policy principles.
- All insurance claims shall be lodged promptly and managed in accordance with policy terms.
- Insurance certificates and policy documents shall be maintained and stored securely.
- Key insurance information, including coverage limits, excesses, and renewal dates, shall be documented in an insurance register.
- Compliance with insurance policy conditions shall be monitored to avoid coverage disputes.

6. Roles and Responsibilities

- **MANCOM:** Approves the annual insurance programme and premium expenditure.
- **General Secretary:** Manages the insurance portfolio and claims process.
- **Finance Department:** Maintains insurance records, processes premium payments, and coordinates claims.
- **Insurance Broker** (if engaged): Provides advice and placement services.

7. Monitoring and Compliance

Insurance shall be monitored through the insurance register, annual coverage reviews, tracking of claims and outcomes, and periodic broker performance evaluation.

8. Review Frequency

This policy shall be reviewed every two years. Insurance coverage shall be reviewed annually at renewal.

3.6 Business Continuity Management Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish a framework for business continuity management, ensuring SASBO can continue critical operations during and after disruptive events.

2. Scope

This policy applies to all SASBO operations and establishes requirements for business continuity planning, disaster recovery, and crisis management.

3. Regulatory and Legislative References

ISO 22301:2019 Business Continuity Management Systems; King IV Report on Corporate Governance.

4. Policy Statements

- SASBO shall maintain a Business Continuity Plan (BCP) addressing response to disruptive events including natural disasters, infrastructure failure, cyber incidents, and pandemic.
- Critical business processes shall be identified through Business Impact Analysis (BIA) and prioritised for recovery.
- Recovery Time Objectives (RTO) and Recovery Point Objectives (RPO) shall be established for critical processes.
- IT disaster recovery arrangements shall ensure timely recovery of critical systems and data.
- Emergency contact lists and communication protocols shall be maintained and tested regularly.
- The BCP shall be tested annually through tabletop exercises or simulations.
- Staff shall be trained on their roles and responsibilities during business continuity events.
- Lessons learned from disruptions and exercises shall be incorporated into plan updates.

5. Roles and Responsibilities

- **MANCOM:** Approves the BCP and provides oversight of business continuity management.
- **General Secretary:** Leads business continuity planning and serves as Crisis Manager during events.
- **IT Department:** Responsible for IT disaster recovery planning and execution.
- **Branch Secretaries:** Implement local business continuity arrangements.
- **All Staff:** Participate in training and exercises and execute their assigned roles during events.

6. Monitoring and Compliance

Business continuity shall be monitored through annual BCP reviews, exercise results and lessons learned, incident response performance, and recovery capability assessments.

7. Review Frequency

This policy shall be reviewed annually. The BCP shall be tested and updated annually or following significant organisational changes.

4. REGULATORY COMPLIANCE POLICIES

This section addresses SASBO's obligations under specific legislation and establishes policies ensuring compliance with the full spectrum of South African regulatory requirements applicable to a registered trade union.

4.1 Labour Relations Act (LRA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Labour Relations Act, No. 66 of 1995, as the foundational legislation governing trade union registration, operation, and collective bargaining rights.

2. Scope

This policy applies to all SASBO activities regulated by the LRA, including union registration, constitution maintenance, financial reporting, collective bargaining, industrial action, and workplace representation.

3. Constitutional References

Preamble (registered under LRA), Clause 28 (constitutional amendments per LRA requirements).

4. Regulatory and Legislative References

Labour Relations Act 66 of 1995 (as amended); LRA Regulations; CCMA Rules; Bargaining Council Constitutions.

5. Policy Statements

- SASBO shall maintain its registration as a trade union in good standing with the Registrar of Labour Relations.
- The SASBO Constitution shall comply with the requirements of Schedule 7 of the LRA and any amendments thereto.
- Annual financial statements and prescribed information shall be submitted to the Registrar within the statutory timeframes.
- Collective bargaining shall be conducted in accordance with the LRA and applicable bargaining council agreements.
- Industrial action shall only be undertaken in compliance with LRA procedures, including referral, conciliation, and ballot requirements.
- The 2018 LRA amendments regarding picketing rules, essential services, and strike balloting shall be observed.

- Shop steward appointments and workplace representation shall comply with LRA provisions and employer recognition agreements.
- All changes to the Constitution shall be registered with the Registrar in accordance with section 102 of the LRA.

6. Roles and Responsibilities

- **General Secretary:** Primary responsibility for LRA compliance and liaison with the Registrar.
- **Legal Department:** Advises on LRA interpretation and compliance requirements.
- **Industrial Relations Officers:** Ensure compliance in collective bargaining and dispute resolution.
- **Branch Secretaries:** Ensure compliance at branch level.

7. Monitoring and Compliance

LRA compliance shall be monitored through tracking of regulatory submissions, review of collective bargaining activities, monitoring of industrial action procedures, and engagement with the Registrar.

8. Review Frequency

This policy shall be reviewed every two years or upon significant LRA amendments.

4.2 Basic Conditions of Employment Act (BCEA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Basic Conditions of Employment Act, No. 75 of 1997, in its capacity as an employer.

2. Scope

This policy applies to SASBO's employment relationships with all staff, including working hours, leave, remuneration, and termination.

3. Constitutional References

Clause 10 (staff matters), Clause 13.8 (MANCOM powers regarding staff).

4. Regulatory and Legislative References

Basic Conditions of Employment Act 75 of 1997 (as amended); BCEA Regulations; Sectoral Determinations.

5. Policy Statements

- SASBO shall comply with all BCEA provisions regarding working hours, overtime, leave, and remuneration.
- Working hours shall not exceed the limits prescribed by the BCEA, and overtime shall be compensated in accordance with statutory requirements.
- Leave entitlements, including annual leave, sick leave, family responsibility leave, and parental leave, shall meet or exceed BCEA minimums.
- The earnings threshold (currently R261,748.45 per annum) shall be applied correctly in determining BCEA applicability.
- Payslips containing all information required by section 33 of the BCEA shall be provided to all employees.
- Termination of employment shall comply with BCEA notice requirements and procedural fairness.
- The Personnel Conditions and Benefits Manual shall be aligned with BCEA requirements.
- Changes to BCEA provisions, including annual threshold adjustments, shall be monitored and implemented.

6. Roles and Responsibilities

- **General Secretary:** Overall responsibility for BCEA compliance as employer representative.
- **Human Resources:** Implements BCEA-compliant employment practices and maintains records.
- **Finance Department:** Ensures payroll compliance with BCEA requirements.
- **Line Managers:** Apply BCEA provisions in day-to-day people management.

7. Monitoring and Compliance

BCEA compliance shall be monitored through payroll audits, leave records review, working hours monitoring, and periodic compliance assessments.

8. Review Frequency

This policy shall be reviewed annually to incorporate BCEA threshold adjustments and amendments.

4.3 Employment Equity Act (EEA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Employment Equity Act, No. 55 of 1998, promoting equal opportunity and fair treatment in employment.

2. Scope

This policy applies to all employment practices within SASBO, including recruitment, development, promotion, and remuneration.

3. Constitutional References

Clause 3.7 (promotion of the material, social, and cultural interests of members).

4. Regulatory and Legislative References

Employment Equity Act 55 of 1998 (as amended by the Employment Equity Amendment Act 2022); EEA Regulations; Code of Good Practice on Equal Pay/Remuneration; Code of Good Practice for the Employment of People with Disabilities.

5. Policy Statements

- SASBO shall eliminate unfair discrimination in employment policies and practices.
- An Employment Equity Plan shall be developed and implemented in accordance with statutory requirements.
- Numerical targets and affirmative action measures shall be established to achieve equitable representation of designated groups.
- Equal pay for work of equal value shall be ensured in accordance with section 6(4) of the EEA.
- Reasonable accommodation shall be provided for people with disabilities.
- Employment equity reports (EEA2 and EEA4) shall be submitted to the Department of Employment and Labour annually.
- An Employment Equity Committee shall be constituted and consulted on employment equity matters.
- Sector-specific numerical targets established under the Employment Equity Amendment Act 2022 shall be incorporated into planning.

6. Roles and Responsibilities

- **MANCOM:** Approves the Employment Equity Plan and monitors implementation.

- **General Secretary:** Senior Manager responsible for employment equity compliance.
- **Human Resources:** Develops and implements the Employment Equity Plan and prepares reports.
- **Employment Equity Committee:** Consults on employment equity matters and monitors progress.
- **Line Managers:** Implement affirmative action measures in their areas.

7. Monitoring and Compliance

Employment equity shall be monitored through annual employment equity reports, tracking of numerical targets, workforce profile analysis, and equal pay audits.

8. Review Frequency

This policy shall be reviewed annually. The Employment Equity Plan shall be reviewed in accordance with its prescribed duration (currently five years from September 2025).

4.4 Skills Development Act Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Skills Development Act, No. 97 of 1998, and associated legislation regarding skills development contributions and workplace learning.

2. Scope

This policy applies to all skills development activities within SASBO, including the Skills Development Levy, Workplace Skills Plan, and Annual Training Report.

3. Regulatory and Legislative References

Skills Development Act 97 of 1998 (as amended); Skills Development Levies Act 9 of 1999; SETA Grant Regulations; National Qualifications Framework Act 67 of 2008.

4. Policy Statements

- SASBO shall pay the Skills Development Levy (currently 1% of payroll) in accordance with the Skills Development Levies Act.
- A Workplace Skills Plan (WSP) shall be submitted to the relevant SETA annually by the prescribed deadline.
- An Annual Training Report (ATR) shall be submitted reporting on training conducted in the preceding year.
- SETA grants shall be claimed where applicable to support training initiatives.

- Training and development activities shall be aligned with SASBO's strategic objectives and skills needs.
- Learnership and internship programmes shall be implemented where appropriate to support skills development.
- Records of all training and development activities shall be maintained for reporting purposes.
- Skills development shall be integrated with the B-BBEE skills development element requirements.

5. Roles and Responsibilities

- **General Secretary:** Overall responsibility for skills development compliance.
- **Human Resources:** Develops WSP and ATR, coordinates training, and claims grants.
- **Finance Department:** Ensures timely payment of the Skills Development Levy.
- **Line Managers:** Identify training needs and support employee development.

6. Monitoring and Compliance

Skills development compliance shall be monitored through WSP/ATR submission tracking, levy payment records, grant claim status, and training activity records.

7. Review Frequency

This policy shall be reviewed annually in alignment with the WSP/ATR cycle.

4.5 B-BBEE Act Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Broad-Based Black Economic Empowerment Act, No. 53 of 2003, and to advance transformation in procurement, employment, and socio-economic development.

2. Scope

This policy applies to all B-BBEE-related activities within SASBO, including scorecard management, procurement, employment equity alignment, and socio-economic development initiatives.

3. Constitutional References

Clause 3.2 (advancement of members' interests), Clause 3.7 (material, social, and cultural interests).

4. Regulatory and Legislative References

B-BBEE Act 53 of 2003 (as amended); B-BBEE Codes of Good Practice; Financial Sector Code; Preferential Procurement Policy Framework Act 5 of 2000.

5. Policy Statements

- SASBO shall achieve and maintain a B-BBEE Level 2 or better contributor status.
- An annual B-BBEE verification shall be conducted by an accredited verification agency.
- Procurement shall prioritise suppliers with strong B-BBEE credentials in accordance with the Supply Chain Management Policy.
- Employment equity targets shall be aligned with B-BBEE management control requirements.
- Skills development expenditure shall be tracked and reported for B-BBEE scorecard purposes.
- Enterprise and Supplier Development (ESD) initiatives shall be implemented to support black-owned businesses.
- Socio-Economic Development (SED) investments shall target beneficiaries aligned with B-BBEE definitions.
- B-BBEE compliance reports shall be submitted to the Financial Sector Transformation Council by the annual deadline (currently 27 February for the preceding year).

6. Roles and Responsibilities

- **MANCOM:** Approves B-BBEE strategy and monitors scorecard performance.
- **General Secretary:** Overall responsibility for B-BBEE compliance.
- **Procurement:** Implements preferential procurement and tracks supplier B-BBEE status.
- **Human Resources:** Aligns employment equity and skills development with B-BBEE requirements.
- **Finance Department:** Tracks and reports on B-BBEE expenditure.

7. Monitoring and Compliance

B-BBEE compliance shall be monitored through annual verification, scorecard element tracking, procurement spend analysis, and compliance report submissions.

8. Review Frequency

This policy shall be reviewed annually or upon changes to the B-BBEE Codes of Good Practice.

4.6 Protection of Personal Information Act (POPIA) Compliance Framework

- **Policy Owner:** General Secretary (Information Officer)
- **Approval Authority:** MANCOM

1. Purpose

To establish a comprehensive framework for compliance with the Protection of Personal Information Act, No. 4 of 2013, protecting the personal information of members, staff, and other data subjects.

2. Scope

This framework applies to all processing of personal information by SASBO, including collection, storage, use, disclosure, and destruction of personal information.

3. Constitutional References

Clause 3.6 (member benefit schemes involving personal information).

4. Regulatory and Legislative References

Protection of Personal Information Act 4 of 2013; POPIA Regulations; Information Regulator Guidelines; Cybercrimes Act 19 of 2020.

5. Policy Statements

- SASBO shall process personal information in accordance with the eight conditions for lawful processing set out in POPIA.
- The General Secretary shall serve as the Information Officer and shall be registered with the Information Regulator.
- A Deputy Information Officer may be designated to assist with POPIA compliance.
- Personal information shall only be collected for specific, explicitly defined, and lawful purposes.
- Appropriate technical and organisational measures shall be implemented to protect personal information against loss, damage, or unauthorised access.
- Data subjects shall be informed of the purpose of collection and their rights under POPIA.
- Data subject access requests shall be processed within the statutory timeframe (currently 30 days).
- Data breaches shall be reported to the Information Regulator and affected data subjects in accordance with the Data Breach Notification and Response Policy.
- Consent shall be obtained where required and managed in accordance with the Consent Management Policy.
- Cross-border transfers of personal information shall only occur in compliance with section 72 of POPIA.

6. Roles and Responsibilities

- **Information Officer (General Secretary):** Overall responsibility for POPIA compliance and liaison with the Information Regulator.
- **Deputy Information Officer:** Assists with day-to-day POPIA compliance.
- **IT Department:** Implements technical security measures and access controls.
- **All Staff:** Process personal information in accordance with this framework and report potential breaches.

7. Monitoring and Compliance

POPIA compliance shall be monitored through compliance audits, data subject request tracking, breach incident analysis, and training completion records.

8. Review Frequency

This framework shall be reviewed annually or upon significant Information Regulator guidance updates.

4.7 Promotion of Access to Information Act (PAIA) Compliance Policy and Manual

- **Policy Owner:** General Secretary (Information Officer)
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Promotion of Access to Information Act, No. 2 of 2000, and to establish procedures for responding to information access requests.

2. Scope

This policy applies to all requests for access to records held by SASBO and establishes the PAIA Manual requirements.

3. Regulatory and Legislative References

Promotion of Access to Information Act 2 of 2000 (as amended); PAIA Regulations; Information Regulator Guidelines.

4. Policy Statements

- SASBO shall maintain a PAIA Manual (Information Manual) as required by section 51 of PAIA, describing the categories of records held and procedures for access.
- The PAIA Manual shall be updated annually and submitted to the Information Regulator.
- The Information Officer (General Secretary) shall be responsible for PAIA compliance.
- Information access requests shall be processed in accordance with the prescribed procedures and timeframes.

- Prescribed fees may be charged for access to records in accordance with the PAIA fee schedule.
- Grounds for refusal of access shall be applied in accordance with Chapter 4 of PAIA.
- Internal appeals against refusal of access shall be considered by MANCOM.
- Records of all access requests and outcomes shall be maintained.
- The PAIA Annual Report shall be submitted to the Information Regulator by the prescribed deadline (currently 30 June).

5. Roles and Responsibilities

- **Information Officer (General Secretary):** Receives and processes access requests, maintains the PAIA Manual.
- **Deputy Information Officer:** Assists with request processing and record management.
- **MANCOM:** Considers internal appeals against refusal of access.
- **Records Custodians:** Locate and provide records responsive to requests.

6. Monitoring and Compliance

PAIA compliance shall be monitored through request tracking, response time analysis, annual report submissions, and manual update status.

7. Review Frequency

This policy shall be reviewed annually. The PAIA Manual shall be updated annually as required by regulation.

4.8 Information Access Request Evaluation Policy

- **Policy Owner:** General Secretary (Information Officer)
- **Approval Authority:** MANCOM

1. Purpose

To establish criteria and procedures for evaluating requests for access to information under PAIA and POPIA, ensuring consistent and lawful decision-making.

2. Scope

This policy applies to all information access requests received by SASBO, whether under PAIA, POPIA, or other legal basis.

3. Regulatory and Legislative References

Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013.

4. Policy Statements

- All access requests shall be logged and acknowledged within five working days of receipt.
- Requests shall be evaluated to determine the applicable legal framework (PAIA for access to records, POPIA for data subject access).
- The validity of the request shall be assessed, including the identity of the requester and the adequacy of information provided.
- A search for responsive records shall be conducted and documented.
- Each responsive record shall be evaluated against applicable grounds for refusal.
- Mandatory grounds for refusal shall be applied where applicable (e.g., legal privilege, safety of individuals).
- Discretionary grounds for refusal shall be considered in light of the public interest override.
- Decisions shall be communicated to the requester within the statutory timeframe, with reasons provided for any refusal.
- Partial disclosure shall be considered where certain information may be redacted while granting access to the remainder.

5. Roles and Responsibilities

- **Information Officer:** Evaluates requests and makes access decisions.
- **Deputy Information Officer:** Assists with evaluation and coordinates searches.
- **Legal Advisors:** Consulted on complex evaluations involving grounds for refusal.
- **Records Custodians:** Conduct searches and identify responsive records.

6. Monitoring and Compliance

Request evaluation shall be monitored through the access request log, decision consistency review, and appeal outcomes analysis.

7. Review Frequency

This policy shall be reviewed annually alongside the PAIA Compliance Policy.

4.9 Mandatory Disclosure and Proactive Transparency Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish SASBO's commitment to proactive transparency and mandatory disclosure beyond the minimum requirements of access to information legislation.

2. Scope

This policy applies to the proactive publication of information by SASBO and establishes categories of information that shall be routinely made available.

3. Constitutional References

Clause 27 (official publication), Clause 3.2 (informing members of union activities).

4. Regulatory and Legislative References

Promotion of Access to Information Act 2 of 2000 (section 52 proactive disclosure); King IV Report on Corporate Governance.

5. Policy Statements

- SASBO is committed to transparency in its operations and proactive disclosure of information of public interest.
- The following categories of information shall be proactively published: audited annual financial statements, NEC and Congress resolutions (non-confidential), collective agreements concluded, office bearer election results, and constitutional amendments.
- Information shall be published through the official publication, website, and member app as appropriate.
- Proactive disclosure shall not include confidential strategic information, personal information of members or staff, or information protected by legal privilege.
- The PAIA Manual shall include a description of information proactively disclosed.
- Proactive disclosure supports SASBO's accountability to members and stakeholders.
- The costs and benefits of proactive disclosure shall be considered when determining publication formats and channels.

6. Roles and Responsibilities

- **General Secretary:** Approves information for proactive disclosure.
- **Communications Department:** Publishes information through appropriate channels.
- **Information Officer:** Ensures proactive disclosure is reflected in the PAIA Manual.

7. Monitoring and Compliance

Proactive disclosure shall be monitored through publication tracking and periodic review of disclosure categories.

8. Review Frequency

This policy shall be reviewed every two years or upon changes to transparency requirements.

4.10 Prevention and Combating of Corrupt Activities Act (PRECCA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Prevention and Combating of Corrupt Activities Act, No. 12 of 2004, and to establish a zero-tolerance approach to corruption.

2. Scope

This policy applies to all SASBO operations, office bearers, staff, and persons acting on behalf of SASBO.

3. Regulatory and Legislative References

Prevention and Combating of Corrupt Activities Act 12 of 2004; National Treasury Regulations.

4. Policy Statements

- SASBO has zero tolerance for corruption, bribery, and related offences as defined in PRECCA.
- All office bearers and staff shall conduct themselves with integrity and shall not offer, give, solicit, or receive any gratification to influence any act or decision.
- Corrupt activities involving SASBO funds or procurement shall be reported to the South African Police Service.
- Transactions exceeding R100,000 involving suspected corrupt activities shall be reported to the Register for Tender Defaulters in accordance with section 34 of PRECCA.
- Persons found to have engaged in corrupt activities shall be subject to disciplinary action, termination, and criminal prosecution.
- Anti-corruption training shall be provided to all staff and office bearers.
- Due diligence shall be conducted on contractors and suppliers to identify corruption risks.
- The Whistleblowing Policy provides protection for persons reporting suspected corruption.

5. Roles and Responsibilities

- **MANCOM:** Provides oversight of anti-corruption measures.
- **General Secretary:** Overall responsibility for PRECCA compliance and reporting.
- **Finance Department:** Monitors transactions for corruption indicators.
- **All Staff and Office Bearers:** Comply with PRECCA and report suspected corruption.

6. Monitoring and Compliance

PRECCA compliance shall be monitored through procurement audits, gift register review, incident tracking, and reporting to authorities.

7. Review Frequency

This policy shall be reviewed every two years or upon significant PRECCA amendments.

4.11 Financial Intelligence Centre Act (FICA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Financial Intelligence Centre Act, No. 38 of 2001, regarding anti-money laundering and counter-terrorist financing obligations where applicable.

2. Scope

This policy applies to SASBO's financial operations and establishes procedures for identifying and reporting suspicious transactions.

3. Regulatory and Legislative References

Financial Intelligence Centre Act 38 of 2001 (as amended); FICA Regulations; Financial Action Task Force (FATF) Recommendations.

4. Policy Statements

- Although SASBO is not an accountable institution under FICA, it shall implement appropriate measures to prevent the use of union funds for money laundering or terrorist financing.
- Large cash transactions shall be avoided, and transactions exceeding R25,000 in cash shall require approval from the General Secretary.
- Unusual or suspicious transactions shall be investigated and, where appropriate, reported to the Financial Intelligence Centre.
- Know Your Customer (KYC) principles shall be applied to significant financial relationships.
- Source of funds shall be verified for large donations or contributions.
- Staff handling financial transactions shall receive training on identifying suspicious activities.
- Records of financial transactions shall be retained for at least five years.
- SASBO shall cooperate with law enforcement agencies investigating financial crimes.

5. Roles and Responsibilities

- **General Secretary:** Overall responsibility for FICA compliance and suspicious transaction reporting.
- **Finance Department:** Implements transaction monitoring and record-keeping.
- **All Staff Handling Funds:** Identify and report unusual transactions.

6. Monitoring and Compliance

FICA compliance shall be monitored through transaction review, suspicious transaction tracking, and cash handling audits.

7. Review Frequency

This policy shall be reviewed every two years or upon significant FICA amendments.

4.12 Tax Law Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with all applicable tax legislation, including income tax, value-added tax (VAT), pay-as-you-earn (PAYE), and other tax obligations.

2. Scope

This policy applies to all tax-related matters affecting SASBO, including tax registration, returns, payments, and record-keeping.

3. Regulatory and Legislative References

Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011; Fourth Schedule to the Income Tax Act (PAYE).

4. Policy Statements

- SASBO shall maintain registration with the South African Revenue Service (SARS) for all applicable taxes.
- Tax returns shall be submitted accurately and within prescribed deadlines.
- Tax payments shall be made timeously to avoid penalties and interest.
- PAYE shall be deducted from employee remuneration and paid to SARS monthly.
- VAT shall be charged, collected, and remitted in accordance with the VAT Act where SASBO is a registered vendor.
- Employee tax certificates (IRP5) shall be issued annually.

- Tax records shall be retained for the prescribed period (currently five years from submission).
- External tax advisors may be engaged for complex tax matters.
- Tax planning shall be conducted within the bounds of the law, avoiding aggressive tax avoidance schemes.

5. Roles and Responsibilities

- **MANCOM:** Approves tax strategy and major tax decisions.
- **General Secretary:** Overall responsibility for tax compliance.
- **Finance Department:** Prepares returns, calculates liabilities, and makes payments.
- **External Tax Advisors:** Provide advice on complex tax matters and conduct annual tax review.

6. Monitoring and Compliance

Tax compliance shall be monitored through return submission tracking, payment records, SARS correspondence management, and annual tax review.

7. Review Frequency

This policy shall be reviewed annually or upon significant tax legislation changes.

4.13 Occupational Health and Safety Act (OHSA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Occupational Health and Safety Act, No. 85 of 1993, protecting the health and safety of staff, members, and visitors at SASBO premises.

2. Scope

This policy applies to all SASBO workplaces, including head office, regional offices, and branch premises.

3. Constitutional References

Clause 10 (staff matters).

4. Regulatory and Legislative References

Occupational Health and Safety Act 85 of 1993; OHSA General Safety Regulations; OHSA Construction Regulations (where applicable).

5. Policy Statements

- SASBO shall provide and maintain a working environment that is safe and without risk to the health of employees.
- Health and Safety Representatives shall be appointed in accordance with section 17 of OHSA.
- A Health and Safety Committee shall be established where required by section 19 of OHSA.
- Risk assessments shall be conducted to identify workplace hazards and implement appropriate controls.
- Incident reporting and investigation procedures shall be implemented and incidents reported to the Department of Employment and Labour where required.
- First aid equipment and trained first aiders shall be available at all workplaces.
- Emergency evacuation plans shall be developed, communicated, and tested regularly.
- Staff shall receive health and safety training appropriate to their roles.
- Contractors working at SASBO premises shall comply with SASBO health and safety requirements.

6. Roles and Responsibilities

- **General Secretary:** Employer representative under OHSA (section 16.2 appointee).
- **Health and Safety Representatives:** Conduct inspections, report hazards, and represent employees.
- **Health and Safety Committee:** Consults on health and safety matters and reviews incidents.
- **Line Managers:** Implement health and safety measures in their areas.
- **All Employees:** Comply with health and safety requirements and report hazards.

7. Monitoring and Compliance

OHSA compliance shall be monitored through workplace inspections, incident statistics, training records, and regulatory inspection outcomes.

8. Review Frequency

This policy shall be reviewed annually or upon significant OHSA amendments.

4.14 Compensation for Occupational Injuries and Diseases Act (COIDA) Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993, including registration, assessment payment, and claims management.

2. Scope

This policy applies to all COIDA-related obligations, including registration, annual assessment payments, incident reporting, and claims submission.

3. Regulatory and Legislative References

Compensation for Occupational Injuries and Diseases Act 130 of 1993; COIDA Amendment Act 10 of 2022 (commenced 23 January 2026); COIDA Regulations.

4. Policy Statements

- SASBO shall maintain registration with the Compensation Fund and pay annual assessments timeously.
- Occupational injuries and diseases shall be reported to the Compensation Commissioner within the prescribed timeframes.
- The COIDA Amendment Act 2022 provisions, including the 10% administrative penalty for late reporting and extended three-year claim prescription period, shall be complied with.
- Injured employees shall be supported in submitting claims and receiving compensation.
- Return-to-work programmes shall be implemented to support employees recovering from occupational injuries.
- COIDA claims shall be managed in accordance with prescribed procedures.
- COIDA records shall be retained for the prescribed period (currently seven years).
- The Letter of Good Standing shall be maintained and renewed annually.

5. Roles and Responsibilities

- **General Secretary:** Overall responsibility for COIDA compliance.
- **Human Resources:** Manages incident reporting, claims submission, and return-to-work programmes.
- **Finance Department:** Manages assessment payments and tracks COIDA expenditure.
- **Line Managers:** Report incidents promptly and support injured employees.

6. Monitoring and Compliance

COIDA compliance shall be monitored through registration status, assessment payment records, incident reporting statistics, and claims outcomes.

7. Review Frequency

This policy shall be reviewed annually or upon significant COIDA amendments. The recent COIDA Amendment Act 2022 requirements shall be incorporated.

4.15 Registrar of Labour Relations Reporting and Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure timely and accurate reporting to the Registrar of Labour Relations as required by the Labour Relations Act.

2. Scope

This policy applies to all reporting obligations to the Registrar of Labour Relations, including annual financial statements, constitutional amendments, and prescribed information.

3. Constitutional References

Preamble (registered under LRA), Clause 28 (constitutional amendments).

4. Regulatory and Legislative References

Labour Relations Act 66 of 1995, Chapter VI; LRA Regulations.

5. Policy Statements

- Annual audited financial statements shall be submitted to the Registrar within six months of the financial year-end (currently by 30 June for a December year-end).
- The annual return (LR Form 2) shall be submitted with the financial statements.
- Changes to the Constitution shall be registered with the Registrar within 30 days of adoption.
- Changes to office bearers shall be notified to the Registrar using the prescribed form.
- The registered address shall be kept current, and changes notified within 30 days.
- All communications from the Registrar shall be responded to within the specified timeframes.
- Copies of all submissions to the Registrar shall be retained.
- The union's certificate of registration shall be displayed at the registered office.

6. Roles and Responsibilities

- **General Secretary:** Primary liaison with the Registrar and signatory on submissions.
- **Finance Department:** Prepares financial statements and coordinates external audit.
- **Legal Department:** Manages constitutional amendment registration.
- **Administration:** Tracks submission deadlines and maintains records.

7. Monitoring and Compliance

Registrar compliance shall be monitored through a compliance calendar, submission tracking, and correspondence log.

8. Review Frequency

This policy shall be reviewed every two years or upon changes to LRA reporting requirements.

4.16 Immigration Act Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Immigration Act, No. 13 of 2002, both in its capacity as an employer of staff and in its capacity as a trade union advocating for the fair treatment of members employed in the financial services sector, including foreign nationals holding valid work authorisation.

2. Scope

This policy applies to all SASBO employment practices involving the verification of work authorisation, as well as SASBO's representational and advocacy activities concerning members who are foreign nationals lawfully employed in the financial services sector.

3. Constitutional References

Clause 3.1 (objects of the union), Clause 3.2 (advancement of members' interests), Clause 5 (membership eligibility).

4. Regulatory and Legislative References

- Immigration Act 13 of 2002 (as amended);
- Immigration Regulations, 2014;
- Employment Services Act 4 of 2014;
- Employment Equity Act 55 of 1998;
- Labour Relations Act 66 of 1995; POPIA No. 4 of 2013.

5. Policy Statements

- SASBO shall, as an employer, verify that every prospective employee is a South African citizen, permanent resident, or holder of a valid work visa or permit authorising employment in the Republic of South Africa, prior to the commencement of employment.

- Certified copies of identity documents, passports, and work visas or permits shall be obtained and retained in the employee's personnel file. The General Secretary shall ensure that work authorisation documentation is verified against the Department of Home Affairs records where practicable.
- No person shall be employed or permitted to commence work without valid work authorisation. Employment of a person who does not hold lawful work authorisation constitutes an offence under Section 49 of the Immigration Act and exposes SASBO to criminal liability and financial penalties.
- Where an employee's work visa or permit is due to expire, the General Secretary shall notify the employee at least 90 days before expiry and shall require proof of renewal or extension before the expiry date. Failure to obtain a renewed permit shall result in suspension of duties pending regularisation, or termination of employment where regularisation is not achieved within a reasonable period.
- SASBO shall not unfairly discriminate against any employee or prospective employee on the basis of nationality, provided the person holds valid work authorisation. Recruitment decisions shall be based on merit, qualifications, and experience in accordance with the Recruitment and Selection Policy.
- In its capacity as a trade union, SASBO shall advocate for the fair treatment of all members lawfully employed in the financial services sector, regardless of nationality. SASBO shall monitor employer compliance with the Immigration Act and shall intervene where members are subjected to unlawful practices, including the employment of undocumented workers to undermine wages and conditions, or the unfair termination of members on immigration-related grounds without due process.
- SASBO shall engage with employer institutions, the Department of Home Affairs, and the Department of Employment and Labour to address systemic immigration compliance issues affecting the financial services sector, including quota determinations and the processing of critical skills visas.
- All personal information relating to an employee's immigration status shall be processed and stored in accordance with POPIA. Immigration documentation shall be classified as special personal information and shall be subject to enhanced access controls.
- SASBO shall maintain a register of all employees holding work visas or permits, recording the type of authorisation, date of issue, date of expiry, and renewal status. The General Secretary shall review this register quarterly.

6. Roles and Responsibilities

- **General Secretary:** Overall responsibility for Immigration Act compliance; maintains the work authorisation register; ensures verification procedures are followed for all appointments.
- **Finance Manager:** Verifies work authorisation documentation during payroll setup; flags approaching visa expiry dates.
- **Line Managers:** Ensure that no person commences work in their area without confirmed work authorisation from the General Secretary.
- **Industrial Relations Officers:** Monitor employer compliance with the Immigration Act in the financial services sector and represent members in immigration-related disputes.

- **All Staff:** Report any concerns regarding immigration compliance to the General Secretary.

7. Monitoring and Compliance

Immigration Act compliance shall be monitored through the work authorisation register, quarterly review of visa expiry dates, verification audit during recruitment, tracking of employer compliance issues raised by members, and reporting of immigration-related disputes and outcomes.

8. Review Frequency

This policy shall be reviewed every two years or upon significant amendments to the Immigration Act or Immigration Regulations.

4.17 Employment Services Act Compliance Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To ensure SASBO's compliance with the Employment Services Act, No. 4 of 2014, and to establish SASBO's position on the regulation of private employment services, temporary employment services, and the protection of workers engaged through labour intermediaries in the financial services sector.

2. Scope

This policy applies to SASBO's own use of employment agencies or temporary employment services, and to SASBO's representational and advocacy activities concerning members affected by the operations of private employment services and temporary employment services in the financial services sector.

3. Constitutional References

Clause 3.1 (objects of the union), Clause 3.2 (advancement of members' interests), Clause 3.7 (promotion of the material, social, and cultural interests of members).

4. Regulatory and Legislative References

Employment Services Act 4 of 2014; Labour Relations Act 66 of 1995 (Sections 198, 198A, 198B, 198C, 198D); Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998; POPIA No. 4 of 2013.

5. Policy Statements

- SASBO shall, in its use of any private employment service or temporary employment service, ensure that the service provider is registered with the Department of Employment and Labour as required by Section 13 of the Employment Services Act.

- SASBO shall not engage any private employment service or temporary employment service that charges fees to work seekers or employees, as this is prohibited under Section 16 of the Employment Services Act and constitutes an offence.
- Where SASBO engages temporary workers through a temporary employment service, such workers shall be treated in accordance with the equal treatment provisions of Section 198A of the LRA. Temporary workers placed at SASBO for longer than three months shall be deemed employees of SASBO for purposes of the LRA and BCEA, and shall receive remuneration and conditions of employment not less favourable than those of comparable permanent employees.
- SASBO shall include appropriate contractual provisions in all agreements with temporary employment services, including compliance warranties, indemnification for non-compliance, and the right to audit the service provider's practices.
- In its capacity as a trade union, SASBO shall monitor the use of temporary employment services and labour brokers in the financial services sector to ensure compliance with the LRA and the Employment Services Act. SASBO shall intervene where employers use temporary employment arrangements to circumvent labour legislation or to undermine the rights and conditions of permanent employees.
- SASBO shall advocate for the registration and regulation of all private employment services operating in the financial services sector and shall report unregistered or non-compliant service providers to the Department of Employment and Labour.
- SASBO shall represent members who are placed by temporary employment services and who are denied the equal treatment protections of Section 198A of the LRA, and shall pursue appropriate remedies through the CCMA, Labour Court, or other competent forums.
- SASBO shall monitor sector-wide trends in the use of temporary employment services, outsourcing, and non-standard forms of employment, and shall make representations to employer institutions, bargaining councils, and government on the impact of these practices on members' employment security and conditions.
- SASBO shall maintain records of all temporary employment services engaged by the union, including the service provider's registration number, the number and duration of placements, and compliance with equal treatment provisions.

6. Roles and Responsibilities

- **General Secretary:** Overall responsibility for Employment Services Act compliance; ensures that all temporary employment services engaged by SASBO are registered and compliant; leads advocacy on temporary employment issues.
- **Finance Manager:** Verifies registration status of temporary employment services before engagement; processes payments and monitors contractual compliance.
- **Industrial Relations Officers:** Monitor employer use of temporary employment services in the financial services sector; represent members in equal treatment disputes; report unregistered service providers.

- **Branch Secretaries:** Report instances of non-compliant temporary employment practices at employer institutions to the General Secretary.
- **All Staff:** Report any concerns regarding the use of unregistered or non-compliant employment services to the General Secretary.

7. Monitoring and Compliance

Employment Services Act compliance shall be monitored through the register of temporary employment services engaged by SASBO, verification of service provider registration, tracking of equal treatment disputes and outcomes, monitoring of sector-wide temporary employment trends, and reporting of non-compliant service providers to the Department of Employment and Labour.

8. Review Frequency

This policy shall be reviewed every two years or upon significant amendments to the Employment Services Act or the temporary employment provisions of the LRA.

5. ETHICS AND INTEGRITY POLICIES

This section establishes SASBO's commitment to the highest standards of ethical conduct, fraud prevention, and integrity in all operations. These policies create a culture of accountability and provide mechanisms for reporting and addressing unethical behaviour.

5.1 Code of Ethics and Conduct

- **Policy Owner:** General Secretary
- **Approval Authority:** NEC

1. Purpose

To establish the ethical standards and conduct expectations for all SASBO office bearers, staff, and representatives, promoting integrity and accountability in all union activities.

2. Scope

This Code applies to all office bearers, staff, Trade Union Representatives, and any person acting on behalf of SASBO.

3. Constitutional References

Clause 3.1 (objects of the union), Clause 24 (member discipline).

4. Regulatory and Legislative References

Protected Disclosures Act 26 of 2000; Prevention and Combating of Corrupt Activities Act 12 of 2004; Labour Relations Act 66 of 1995.

5. Policy Statements

All persons subject to this Code shall act with honesty, integrity, and fairness in all union activities.

Union resources shall be used only for legitimate union purposes and protected from waste, abuse, and misappropriation.

Confidential information shall be protected and not disclosed except where authorised or required by law.

- Conflicts of interest shall be declared and managed in accordance with the Conflict of Interest Management Policy.
- Gifts and hospitality shall be handled in accordance with the Gift and Hospitality Policy.
- Discrimination, harassment, and bullying are prohibited. All persons shall be treated with dignity and respect.
- Compliance with all applicable laws and SASBO policies is mandatory.
- The use of SASBO's name, badge, and resources for personal gain or political purposes is prohibited in accordance with Clause 3.8 of the Constitution.

- Social media usage shall be conducted responsibly, avoiding statements that could damage SASBO's reputation or breach confidentiality.
- Office bearers shall not use their position to secure personal advantages or advantages for family members or associates.
- Breaches of this Code shall be addressed through the applicable disciplinary procedures, which may result in sanctions including removal from office or termination of employment.

6. Roles and Responsibilities

- **NEC:** Approves the Code and provides ethical leadership.
- **MANCOM:** Monitors compliance and addresses ethical issues at management level.
- **General Secretary:** Promotes ethical culture and addresses reported breaches.
- **All Subject Persons:** Comply with the Code and report breaches.

7. Monitoring and Compliance

Compliance with the Code shall be monitored through the ethics reporting mechanism, disciplinary proceedings, and periodic ethics climate assessments.

8. Review Frequency

This Code shall be reviewed every three years or upon significant governance developments. This version replaces the Code of Ethics adopted in June 2000.

5.2 Fraud Prevention and Detection Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish SASBO's commitment to preventing, detecting, and responding to fraud, and to set out the framework for fraud risk management.

2. Scope

This policy applies to all SASBO operations and encompasses fraud by staff, office bearers, members, suppliers, and other parties.

3. Constitutional References

Clause 13 (MANCOM fiduciary responsibilities), Clause 24 (member discipline).

4. Regulatory and Legislative References

Prevention and Combating of Corrupt Activities Act 12 of 2004; Criminal Procedure Act 51 of 1977; common law.

5. Policy Statements

- SASBO has zero tolerance for fraud and will pursue all appropriate remedies, including criminal prosecution, against perpetrators.
- Fraud includes any intentional act involving deception to secure an unfair or unlawful gain, including theft, embezzlement, misrepresentation, forgery, and procurement fraud.
- Fraud risk assessments shall be conducted to identify areas vulnerable to fraud and implement appropriate controls.
- Internal controls shall be designed to prevent and detect fraud, including segregation of duties, authorisation limits, and reconciliations.
- All staff and office bearers shall be vigilant for fraud indicators and report suspected fraud immediately.
- Suspected fraud shall be investigated promptly and confidentially, with findings reported to MANCOM.
- Persons found to have committed fraud shall face disciplinary action, civil recovery, and criminal prosecution.
- Recovery of losses shall be pursued through civil action, insurance claims, and other available means.
- Fraud awareness training shall be provided to all staff.
- This policy replaces and supersedes the Dishonesty Policy adopted in September 1993.

6. Roles and Responsibilities

- **MANCOM:** Provides oversight of fraud prevention and receives investigation reports.
- **General Secretary:** Overall responsibility for fraud prevention and investigation.
- **Finance Department:** Implements financial controls and monitors for fraud indicators.
- **Internal Audit (where applicable):** Reviews control effectiveness and investigates fraud.
- **All Staff and Office Bearers:** Report suspected fraud and comply with controls.

7. Monitoring and Compliance

Fraud prevention shall be monitored through fraud risk assessments, control testing, incident tracking, and investigation outcomes.

8. Review Frequency

This policy shall be reviewed every two years or upon significant changes to fraud patterns or control requirements.

5.3 Whistleblowing and Protected Disclosures Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish procedures for the reporting of wrongdoing and to protect persons who make protected disclosures from occupational detriment.

2. Scope

This policy applies to all staff, office bearers, members, and other persons who report wrongdoing relating to SASBO.

3. Regulatory and Legislative References

Protected Disclosures Act 26 of 2000 (as amended); Companies Act 71 of 2008 (section 159); Prevention and Combating of Corrupt Activities Act 12 of 2004.

4. Policy Statements

- SASBO encourages the reporting of wrongdoing, including fraud, corruption, maladministration, illegality, and danger to health or safety.
- A person who makes a protected disclosure in accordance with the Protected Disclosures Act shall not be subject to occupational detriment.
- Whistleblowing channels shall include: direct reporting to the General Secretary, reporting to the President, and an anonymous reporting mechanism.
- Disclosures shall be treated confidentially to the extent possible while allowing proper investigation.
- Retaliation against a whistleblower is a serious disciplinary offence and may constitute a criminal offence.
- Disclosures shall be investigated promptly and fairly, with findings and action taken communicated to the discloser where appropriate.
- Disclosures made in bad faith or with malicious intent are not protected and may result in disciplinary action.
- Records of disclosures and investigations shall be maintained securely.
- Awareness of whistleblowing rights and procedures shall be promoted through training and communication.

5. Roles and Responsibilities

- **President:** Receives disclosures involving the General Secretary.
- **General Secretary:** Receives disclosures and manages investigations.
- **MANCOM:** Receives reports on disclosures and investigations.
- **Investigators:** Conduct fair and thorough investigations of disclosures.
- **All Persons:** Report wrongdoing through available channels.

6. Monitoring and Compliance

Whistleblowing shall be monitored through disclosure tracking, investigation outcomes, retaliation monitoring, and periodic review of the disclosure mechanism.

7. Review Frequency

This policy shall be reviewed every two years or upon changes to the Protected Disclosures Act.

5.4 Anti-Bribery and Corruption Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish SASBO's zero-tolerance approach to bribery and corruption and to set out prohibited conduct and compliance requirements.

2. Scope

This policy applies to all SASBO operations, office bearers, staff, and third parties acting on behalf of SASBO.

3. Regulatory and Legislative References

Prevention and Combating of Corrupt Activities Act 12 of 2004; UK Bribery Act 2010 (international best practice reference).

4. Policy Statements

- SASBO prohibits all forms of bribery and corruption, whether involving public officials or private parties.
- No person shall offer, promise, give, or accept any bribe, kickback, or improper payment.
- Facilitation payments (small payments to expedite routine government action) are prohibited.
- Third parties acting on behalf of SASBO (agents, consultants, suppliers) shall comply with this policy, and appropriate provisions shall be included in contracts.
- Due diligence shall be conducted on third parties presenting corruption risk.

- Accurate books and records shall be maintained, and no off-the-books accounts or false entries are permitted.
- Charitable donations and sponsorships shall be made transparently and shall not be used to disguise bribery.
- Red flags indicating potential bribery or corruption shall be investigated.
- Violations of this policy shall result in disciplinary action, termination, and criminal prosecution.
- Anti-bribery training shall be provided to staff in high-risk roles.

5. Roles and Responsibilities

- **MANCOM:** Provides oversight of anti-bribery and corruption compliance.
- **General Secretary:** Overall responsibility for anti-bribery compliance.
- **Finance Department:** Maintains accurate records and monitors for unusual transactions.
- **Procurement:** Conducts due diligence on suppliers and monitors procurement integrity.
- **All Staff and Office Bearers:** Comply with this policy and report concerns.

6. Monitoring and Compliance

Anti-bribery compliance shall be monitored through due diligence records, transaction reviews, third-party audits, and incident tracking.

7. Review Frequency

This policy shall be reviewed every two years or upon changes to anti-corruption legislation.

5.5 Gift and Hospitality Policy

- **Policy Owner:** General Secretary
- **Approval Authority:** MANCOM

1. Purpose

To establish guidelines for the giving and receiving of gifts and hospitality, preventing conflicts of interest and the appearance of impropriety.

2. Scope

This policy applies to all office bearers, staff, and Trade Union Representatives in their dealings with external parties.

3. Regulatory and Legislative References

Prevention and Combating of Corrupt Activities Act 12 of 2004; King IV Report on Corporate Governance.

4. Policy Statements

- Gifts and hospitality may be given or accepted only where they are of modest value, are given openly, and do not create an obligation or expectation.
- Cash gifts are prohibited and must be declined.
- Gifts exceeding R500 in value must be declared in the Gift Register maintained by the General Secretary.
- Travel and accommodation funded by third parties require prior approval from the General Secretary.
- Gifts and hospitality shall not be offered or accepted during tender processes or contract negotiations.
- Gifts received that cannot be declined shall be donated to a charitable cause or become SASBO property.
- Entertainment that is lavish, frequent, or inappropriate in the circumstances shall be avoided.
- The Gift Register shall be reviewed by MANCOM quarterly.
- Violations of this policy shall be treated as breaches of the Code of Ethics and addressed accordingly.
- This policy aligns with the Gift, Hospitality and Favours Policy provisions in the Personnel Conditions and Benefits Manual (2020).

5. Roles and Responsibilities

MANCOM: Reviews the Gift Register and addresses concerns.

General Secretary: Maintains the Gift Register and approves exceptional cases.

All Subject Persons: Comply with the policy and make declarations.

6. Monitoring and Compliance

Gift and hospitality shall be monitored through the Gift Register, quarterly reviews, and pattern analysis.

7. Review Frequency

This policy shall be reviewed every two years. The declaration threshold shall be reviewed annually.

5.6 Conflict of Interest Management Policy

Policy Owner: General Secretary

Approval Authority: MANCOM

1. Purpose

To establish procedures for identifying, declaring, and managing conflicts of interest affecting SASBO office bearers, staff, and decision-makers.

2. Scope

This policy applies to all office bearers, staff, committee members, and any person participating in SASBO decision-making.

3. Constitutional References

Clause 13 (MANCOM fiduciary responsibilities).

4. Regulatory and Legislative References

King IV Report on Corporate Governance; Companies Act 71 of 2008 (as guidance).

5. Policy Statements

- A conflict of interest exists where a person's private interests could improperly influence, or appear to influence, their judgment or actions in performing their SASBO duties.
- All persons subject to this policy have a duty to identify and declare conflicts of interest promptly.
- A Conflict of Interest Register shall be maintained by the General Secretary.
- Annual declarations of interest shall be submitted by all office bearers, MANCOM members, and senior staff.
- Ad hoc declarations shall be made whenever a conflict arises in relation to a specific matter.
- Declared conflicts shall be managed through recusal from decision-making, assignment of the matter to another person, or other appropriate measures.
- Failure to declare a conflict of interest is a serious breach of this policy and the Code of Ethics.
- Potential conflicts (where a reasonable person might perceive a conflict) shall also be declared and managed.
- Related party transactions shall be disclosed and subject to enhanced scrutiny.
- The Conflict of Interest Register shall be reviewed by MANCOM annually.

6. Roles and Responsibilities

- **MANCOM:** Reviews declarations and determines management measures for complex conflicts.
- **General Secretary:** Maintains the Conflict of Interest Register and manages declared conflicts.
- **All Subject Persons:** Identify and declare conflicts of interest.
- **Meeting Chairpersons:** Ensure conflicts are declared at the start of meetings.

7. Monitoring and Compliance

Conflict of interest management shall be monitored through the Register, annual declaration compliance, and review of management measures.

8. Review Frequency

This policy shall be reviewed every two years. Annual declarations shall be submitted by 31 March each year.

6. POLICY GOVERNANCE AND REVIEW

6.1 Policy Ownership and Custodianship

Each policy within this chapter has a designated Policy Owner responsible for the content, implementation, and review of the policy. Policy ownership is assigned as follows:

- **Legal Framework Policies:** General Secretary
- Risk Management Policies: General Secretary
- Regulatory Compliance Policies: General Secretary
- Ethics and Integrity Policies: General Secretary, with NEC approval for the Code of Ethics

6.2 Review Cycle

These policies shall be reviewed in accordance with the review frequencies specified in each policy instrument. As a minimum:

- Annual review: All regulatory compliance policies to incorporate legislative changes.
- Biennial review: Legal framework, risk management, and ethics policies.
- Triennial review: Code of Ethics and Conduct.

Reviews may be triggered earlier by significant legislative amendments, operational changes, or incident findings.

6.3 Amendment Procedures

Amendments to these policies shall follow the standard policy amendment procedure:

- (a) The Policy Owner identifies the need for amendment and develops proposed changes.
- (b) Proposed amendments are reviewed by affected stakeholders.
- (c) MANCOM approves amendments to MANCOM-level policies.
- (d) NEC approves amendments to NEC-level policies (Code of Ethics, Risk Appetite Statement).
- (e) Approved amendments are communicated and the policy register is updated.

6.4 Training and Communication

All staff and office bearers shall receive training on the policies relevant to their roles. Training shall be provided:

- Upon joining SASBO (induction training).
- Upon significant policy changes.
- Periodically as refresher training (at least annually for high-risk areas).

Policies shall be accessible on the SASBO intranet and portal for reference by all staff and office bearers.

7. DOCUMENT APPROVAL

<u>Role</u>	<u>Name</u>	<u>Signature</u>	<u>Date</u>
Prepared	Kotani Consulting		
Reviewed by	Secretary Genral		
Approved by	MANCOM		
Approved by	NEC		