

11 EXTERNAL LIAISON OR COMMUNICATION

11.4 REPORTS, PRESENTATIONS AND ACADEMIC PAPERS

In making public presentations on behalf of the company, employees should at all times take steps to protect and enhance the reputation of the company and its employees.

No employees are permitted to make reports, presentations or academic papers available to anyone outside the organisation without having channeled such information through the company's communications and investor relations advisors, after having been approved by the chief executive or his/her designated representative.

12 BRIBERY, FRAUD AND CORRUPTION

12.1 The company does not condone the fraudulent or improper use of its funds or property, and shall institute disciplinary action whenever it becomes aware that an employee may have committed fraud or used the company's funds or property improperly.

12.2 Should an employee be found guilty of fraud or the improper use of the company's funds or property he or she may be liable for summary dismissal, and may also be liable for criminal action.

12.3 Northam prohibits all employees from accepting, making or offering illicit or inappropriate payment of any kind to deliberately interfere with a proper decision-making process to secure unfair commercial advantage or to coerce an individual to enter into a dishonest arrangement.

The company does not condone facilitation payments of any kind to obtain services to which Northam is otherwise legally entitled.

Should an employee be found guilty of fraud or the improper use of the company's funds or property he or she may be liable for summary dismissal, and may also be liable for criminal action.

12.4 If employees become aware of any evidence that the company's funds or property may have been used in a fraudulent or improper manner, they should immediately and confidentially advise the company as set out in the Breach of Code section of this booklet.

13 BREACH OF CODE

Any breach of this code, or any rule or procedure based thereon, will be viewed in a serious light, and persons committing such breach could be subject to disciplinary action, and may in addition be liable to face civil or criminal action.

Employees who believe that their own actions have, or may have contravened this code, should immediately advise the person to whom they report or a member of management.

Employees who become aware of a breach of this code by another employee should immediately bring such breach to the attention of management or should contact the company's independent Fraud Hotline on 0800 15 25 39, where it will be dealt with promptly and equitably and with due regard to confidentiality.

Employees, commonly referred to as "whistle-blowers", who disclose a breach by a fellow employee will be protected against any form of victimisation or occupational detriment provided disclosures have been made in accordance with the provisions of the Protected Disclosures Act (no. 26 of 2000).