


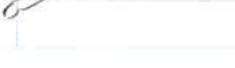


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Policy Owner	Jaco Beukes	Division	Corporate Services
Implemented by	Siphesihle Linda Nyoka	Developed by	Chantelle Nicole Fellingner

APPROVAL RECORD

	Name & Surname	Signature	Date
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2nd Review	HoD's/HR		/
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RECORD OF REVISIONS

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1. INTRODUCTION

SAIL and all its subsidiaries are committed to combating corruption, bribery and anti-competitive collusion, through the implementation of an Anti-Bribery and Corruption Policy ("**this Policy**"). This Policy has been developed to promote appropriate standards and behaviour, in order to prevent bribery, corruption and anti-competitive collusive practices in the various jurisdictions in which SAIL operates. SAIL supports the objectives of this Policy and recognises the legal importance of complying with all anti-bribery, anti-corruption and anti-competitive collusive laws, regulations, and/or policies of South Africa, ("SA anti-bribery law"), including:

- The Prevention and Combating of Corrupt Activities Act, No 12 of 2004 ("**PACCA**");
- The Prevention of Organised Crime Act, No 121 of 1998 ("**POCA**");
- The Competition Act, No 89 of 1998;
- The Companies Act, No 71 of 2008;
- The Constitution of the Republic of South Africa 108 of 1996, and
- King IV.

This policy further recognises the legal requirements of:

- The UK Bribery Act, 2010;
- The United Nations Convention Against Corruption;
- The African Union Convention on Preventing and Combating Corruption;
- and
- The South African Development Community's Protocol against Corruption.

1.1 Purpose and Objectives

The purpose of this policy is to set out the requirements and procedures of all anti bribery and corruption legislation in order to ensure full compliance thereto by all divisions and employees of SAIL. Furthermore, this policy sets out processes and procedures which all SAIL employees shall be subject to in order for SAIL to enforce and implement this policy effectively.

SAIL refuses to offer, give or receive bribes or improper payments, or participate in any kind of corrupt or anti-competitive collusive activity, either directly or indirectly through any third party, in order to obtain new business, retain existing business, or secure any improper advantage, and SAIL furthermore will not use or permit others to do such things on our behalf.

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The nature of SAIL's business requires interaction with persons within various levels of governments, multi-national client companies and third party service providers throughout Africa and the World.

1.2 Scope/Field/Application

The policy shall apply to all SAIL staff including but not limited to, all directors, HOD's, employees (whether permanent, fixed term or temporary), consultants, contractors and agents of SAIL.

1.3 Responsibility and Authority

The Chief Executive Officer of SAIL is responsible for authorising and implementing this policy.

1.3.1. Chief Executive Officer (CEO)

The CEO is responsible for implementing and enforcing this policy and in turn ensuring that all relevant persons comply with the policy as well as the requirements and procedures of the Act.

1.3.2 HOD's/Managers

All HOD's and/or Managers have the responsibility to ensure that its employees comply with this policy and report any bribery, corruption and conflicts of interests to them. HOD's and Managers are also responsible to listen to submit any such information reported to them by an employee to HR.

1.3.3 Employees, consultants, contractors & agents

Each employee, consultant, contractor and agent has the responsibility to prevent, detect and report bribery, corruption and conflicts of interests.

1.3.4 Human Resources

Human Resources has the responsibility to ensure that all reports of bribery, corruption and conflicts of interests are investigated and dealt with in accordance with this policy.





1.4 Definitions, Acronyms and Abbreviations

- 1.4.1** **Bribery** shall mean where a person offers, promises, gives or receives, demands or accepts a financial or other advantage to/from another person with the intention to bring about the improper performance by that other person of a relevant function or activity or to reward such improper performance;
- 1.4.2** **Corruption** shall mean “the abuse of power for personal gain” and bribery and fraud are considered to be aspects of corrupt practices;
- 1.4.3** **PACCA** shall mean The Prevention & Combating of Corrupt Activities Act. PACCA is the primary anti-corruption legislation in South Africa. PACCA aims to prevent and fight corruption in both the public and private sector and creates a general offence of corruption that is broadly defined. In addition to the general crime of corruption, PACCA also criminalises specific corrupt activities.

1.5 References

All legislation as referred to in clause 1

Appendix A: SAIL Gift Register

Appendix B: Declaration of Interest

1.6 Laws and Regulations

Compliance with applicable Laws and Regulations for which SAIL operates would be ensured at all times. It is the responsibility of management of SAIL, or any other person appointed by management, to ensure such compliance and it is up to him/her to seek legal advice as deemed necessary.

1.7 Document Review

The Policy shall be reviewed in January every 3 years or when required.

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2. POLICY

It is SAIL's policy to conduct all its business with transparency, integrity, and enforcing a zero tolerance approach to bribery and corruption. SAIL is committed to performing with honesty and acting professionally in all its business dealings and relationships. Furthermore, SAIL is dedicated to implementing and enforcing effective systems within the company to counter bribery and corruption.

2.1 Bribery and Corruption

PACCA aims to prevent and fight corruption in both the public and private sector and creates a general offence of corruption that is broadly defined. In addition to the general crime of corruption, PACCA also criminalises specific corrupt activities.

A person will be guilty of an offence under PACCA if he/she directly or indirectly accepts or offers to accept a gratification (which is any economic benefit, whether in cash, or in any other form) from another person, or gives or agrees to give a gratification to any other person for his/her benefit, or that of another, where the giving or accepting is done in order to induce the other party to act in an improper manner, in the performance of that individual's duties.

2.1.1 Penalties

Penalties for those convicted of an offence as set out in PACCA can range from limitless fines up to life imprisonment. South African courts view convictions of fraud and corruption as serious violations and sentence of 15 years or more are not unusual. PACCA further provides for a tender register blacklisting companies and individuals convicted of acts of corruption, with the consequence that such entities and individuals cannot do business with the South Africa government for 10 years. Over and above this, it is a criminal offence for an individual or enterprise applying for a tender not to disclose their involvement in a company that has been black-listed.

Further PACCA does have extra-territorial jurisdiction if certain requirements are met. Thus a South African citizen or someone who ordinarily resides in South Africa, as well as companies incorporated or registered in South Africa, can be prosecuted in terms of PACCA regardless of whether the offensive act constitutes an offence at the place of its commission.

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2.1.2 Examples of corrupt offences under PACCA (not exhaustive):

- Offences involving contracts - it is a crime for anyone to accept any form of gratification to influence who will receive a contract in the workplace. Anyone involved in accepting or offering such a gratification will be guilty of corrupt conduct under PACCA, even if the gratification is received or paid by SAIL and the individual does not personally benefit in any way.
- Offences involving a public official – it is a crime for anyone in the private sector to offer a public official gratification to receive a benefit. Furthermore it is also a crime for a public official to offer to do something for someone in the private sector in exchange for gratification;
- Offences that involve tenders - it a crime to offer or accept gratification in order to influence the award of a tender; and
- Offences of conflict of interest- it is a crime for any public officer or employees of corporates to acquire a private interest in a contract connected with the public body.

2.2 Political Donations

SAIL and its employees will never directly or indirectly make a contribution to any political party, organisation or individual engaged in politics in order to obtain an improper advantage in business conducted by SAIL. Furthermore, we will never offer or make any contribution as an incentive or reward for obtaining or retaining business for any improper purpose. SAIL will always make sure the contribution is lawful and appropriate. A proper due diligence will always be conducted to ensure that the contribution is not improper and that approval was obtained if and when required.

2.3 Charitable Donations and Sponsorships

SAIL may make charitable contributions and offer sponsorships for the purposes of socio economic development, research, cultural and sporting activities, provided they are not for improper business purposes.

SAIL will always ensure that the charity is appropriate, legitimate and has all the appropriate registrations. Further we will always conduct a proper



due diligence before making any charitable donation or offering any sponsorship. **SAIL will never offer or make any charitable contribution as an incentive or reward for obtaining or retaining business or for any improper purpose.**

2.4 Facilitation Payments

2.4.1 Definition of facilitation payments

Facilitation payments are usually small payments or gifts made to low-level public officials or employees of corporates in order to speed up or “facilitate” actions the officials are already duty bound to perform.

Facilitation payments are classified as bribes and as such are illegal in South Africa and in other countries where SAIL may conduct business from time to time. Any type of facilitation payment is prohibited, large or small. Even where such payments are payment of such fees is acceptable provided there is a defined business need, the payment is transparent and open, and a receipt perceived as business practice or acceptable under the local law and even if our competitors engage in such practices, no violations of this principle will be tolerated.

2.4.2 Legitimate fees

A legitimate fee is sometimes payable for a speedy service provided by the government, where this is legally permissible. For example, a published amount to get a visa or a new passport more quickly from a consulate. Where payment is obtained and the expense is properly recorded in SAIL’s financial records. It would not, of course, be legitimate, if it is a private payment to the official concerned, in order for him/her to expedite such an application.

2.5 Gifts, Entertainment and Hospitality

SAIL prohibits the offering of or receipt of gifts, hospitality, gratification or entertainment, which could affect or be perceived to affect the outcome of a business transaction and is not reasonable and *bona fide* (in good faith).

SAIL may offer and receive, gifts, hospitality and entertainment openly, unconditionally and without the intention of obtaining or retaining any business advantage, and provided that the value thereof is not excessive.





A business advantage is the unauthorised or improper gaining of a commercial and contractual advantage. If in doubt, you should always consult your manager or person in authority to ensure adherence to this principle.

SAIL will always ensure that:

- all reimbursable entertainment activities involving the SAIL personnel and client/supplier or potential clients has a valid business purpose and the cost is reasonable;
- all gifts and hospitality in excess of R 650, or the rate of exchange equivalent, **received** are declared in a gift register and signed-off by a SAIL manager;
- all gifts and hospitality in excess of R2 500, or the rate of exchange equivalent, **given** to any client/supplier etc. are declared in a gift register and signed-off by an SAIL manager; and
- our operating Corporate Services division is available to SAIL personnel to discuss offering any kind of gift or hospitality to a public official (but generally such things are best avoided).

SAIL or its employees will never:

- give, promise to give or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- threaten or retaliate against another employee who has refused to commit a bribery offence or has raised concerns under this policy;
- solicit gifts or hospitality; or
- offer or accepts gifts of cash or cash equivalent (e.g. vouchers).

The gift register is held with the Head of Finance of the Company and all employees who have a responsibility to declare any gifts shall approach the Head of Finance and complete the gift register accordingly.

The Head of Finance will record the declaration in the gift register and the employee so declaring as well as the Head of Finance will sign off such declaration.





2.6 Business Relationships

SAIL will endeavor to engage with agents, consultants, joint venture partners, consortia, advisors, distributors, contractors, sub-contractors and suppliers (“third parties”) to observe this Policy and act at all times in accordance with SAIL’s standards in relation to bribery and corruption. In order to protect SAIL against the risk of bribes given indirectly, it is the responsibility of SAIL personnel when employing third parties to conduct an appropriate due diligence process.

Third parties need to understand and formally agree to this and it is our responsibility to confirm their behaviour remains compliant.

2.6.1 Collusive Practices

The Competition Act prohibits collusive tendering in the procurement process. Furthermore such conduct also constitutes corrupt activity under PACCA. Collusive tendering or bid rigging is defined as an agreement amongst competitors not to compete on bids they submit after being invited to tender. Together with price fixing and market allocation, collusive tendering falls within the class of conduct referred to as “cartel activity”, which is prohibited.

SAIL personnel must never participate in a bid-rigging cartel or engage in cover pricing to favour one or more companies in exchange , for example, for a “loser’s fee”. This type of conduct amounts to the receiving of gratification and is an offence under PACCA.

Furthermore when an individual participates in a bid-rigging cartel and it is agreed that his/her company will engage in cover pricing so that a rival firm can win the tender in exchange for a sub-contract, this too amounts to a corrupt activity under PACCA.

SAIL personnel must be aware that all parties involved in collusive tendering will be prosecuted under PACCA. It must be noted that the fact that the employee may not derive any personal benefit from the collusive activity is of no relevance.

2.6.2 Procurement policy

SAIL will always verify and check all third parties’ experience, background and reputation. SAIL will endeavour to conduct its procurement practices in a fair and transparent manner.





We will further endeavor to avoid dealing with contractors and suppliers or other business partners known or reasonably suspected to be paying bribes.

All SAIL employees shall be obligated declare any interest in any third party contractors or suppliers which are contracted to SAIL for the provision of products or services.

2.6.3 Compensation and payments to business partners

SAIL will not channel improper payments through agents or other intermediaries. Compensation paid to third parties should be appropriate and justified remuneration for legitimate services rendered.

SAIL will never:

- enter into agreements that do not have a clear and proper commercial rationale;
- pay more than the fair market value for goods and services;
- make payments to third parties without having a binding written agreement (whenever possible) in place and we know exactly what the payment is for; or
- exchange sensitive information with third parties i.e. pricing, other confidential customer information.

SAIL personnel are encouraged to look out for the following behavior:

- unusually large fees or cash payments;
- fees linked to a percentage of the project cost or value;
- a request for money paid into a personal or offshore bank account;
- someone who does not appear to have the experience, expertise or qualifications for what they are being engaged to do; and
- lavish hospitality and gifts.

SAIL personnel must report any suspicious activity to a SAIL HoD.

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2.7 Conflicts of Interests

SAIL encourages avoiding situations in which personal interests or actions could conflict or appear to conflict with the best interests of SAIL its suppliers, contractors and clients. All conflicts of interests should be disclosed, whether real or potential, to the relevant HOD or Manager. Conflicts of interests must be disclosed:

- when explicitly requested by Corporate Services in regard to a bid through the SAIL Newsflash system;
- when a contractor, client or any third party becomes contracted with SAIL, and an employee has an interest in such contractor, client or third party;
- by an employee, at any time when a conflict has or may arise; and
- by all suppliers through the declaration of interest section in the Supplier Vendor Form.

2.7.1 What constitutes a conflict of interest

Conflicts of interest occur when an employee has an undisclosed direct or indirect personal or economic interest in a transaction. Usually the conflict is about an individual benefiting at the expense of SAIL.

It may also apply where there is nothing untoward in the transaction, but the employee or any member of his family or close circle has some involvement with the other party to the transaction, and may stand to benefit financially from that involvement.

Perceptions of conflict of interest can be just as damaging as an actual conflict of interest.

A conflict may occur where an employee accepts inappropriate gifts, favours, or kickbacks from vendors, or when an employee engages in unapproved employment discussions with current or prospective contractors or suppliers.

SAIL personnel must never:

- use contacts or any knowledge gained at the SAIL for personal gain, or to benefit family and friends;
- pay a third party more than contractually agreed i.e. market based fee for goods and services;

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- enter into situations in which their personal, family or financial interest may conflict with those of SAIL; or
- create the impression that customers or suppliers have a contact in SAIL.

2.8 Import and Export of Goods and Services

SAIL complies with all legal requirements for the proper import and export of goods and service. SAIL is committed to trading lawfully at all times, hence compliance with all trade regulations and restrictions imposed by recognised national and internal authorities. All restrictive trade practices are strictly prohibited. As well as complying with all relevant laws, SAIL must obtain all necessary licenses and permits to import and export goods, and in doing so, provide honest and accurate information to customs authorities.

2.9 Lifestyle Audits

2.9.1 Background & Objective:

The objective of a lifestyle audit is to protect SAIL's reputation and uphold its obligations to suppliers as well as to protect employees and the working environment.

A lifestyle audit is a study of a person's living standards to see if it is consistent with his reported income.

SAIL shall have authority to conduct lifestyle audits on its employees, as and when necessary, so long as SAIL does so within the bounds of the law. By signing the contract of employment, every employee agrees to be bound by SAIL's policies, as amended, and every employee agrees to be subjected to a lifestyle audit, whenever the SAIL deems it fit.

SAIL shall only be able to conduct a lifestyle audit where it has a justifiable reason to do so and it is SAIL's obligation to prove that the findings of the lifestyle audit are accurate and valid.

2.9.1 Compliance with Relevant Legislation: In performing lifestyle audits SAIL agrees to respect and promote the employees' right to privacy in that all information gathered on the employee shall be kept highly confidential and only be seen by the necessary persons for purposes of such audit.



As far as possible, the information gathered through the lifestyle audit will be seen by and stored with the independent services provider appointed to perform the audit.

SAIL shall not unfairly discriminate, directly or indirectly, against any employee before, during or after the conduct of the lifestyle audit and employees shall be selected for such an audit only where there is a legitimate and justifiable reason thereof.

Furthermore, SAIL shall comply with all the relevant sections of the Protection of Personal Information Act and any other similar privacy laws and shall ensure all service providers comply therewith.

2.9.3 Process:

- An independent service provider with the necessary knowledge and skills to conduct lifestyle audits will be appointed;
- The lifestyle audit would be conducted by an independent service provider;
- As advised by the service provider – the investigation would be expected to include a review of fixed and movable assets owned, travel and holiday patterns etc.;
- Should the lifestyle audit be proven to be beyond an employee's means, there would be a review of other possible sources of income (other family members, inheritances etc.);
- Should there be proof of irregular income due to their role within SAIL, then there would be a forensic investigation and disciplinary process – with punitive action if and as applicable. The company's disciplinary policy will be followed for those employees that demonstrate a lifestyle beyond their means.

3. HOW TO REPORT SUSPICIOUS TRANSACTIONS

SAIL personnel are required, when discovering or suspecting bribery, corruption or conflict of interest, to immediately report the issue or suspicion. If you are unsure whether a particular act constitutes bribery, corruption or conflict of interest, you must raise your concerns with your HOD or Manager.

Where raising your concern with your HOD or Manger is not appropriate for whatever reason, you may report same to the Human Resources Department, or via the SAIL website through the online form.





SAIL does not tolerate any form of retaliation, harassment or intimidation of a whistle-blower by other as a result of raising concerns in good faith. All concerns will be investigated and appropriate action taken.

The anonymous tip-off form is available on the SAIL website under the Legal Notices and Policies tab. SAIL employees must ensure that all tip-offs submitted via the website are sustainable as each and every tip-off will need to be thoroughly investigated.

4. DEVIATIONS FROM COMPANY POLICY

This Policy should be adhered to at all times. Any non-conformance will be reported to the relevant HoD for inclusion in exception reports.

Any deviation from this procedure or related procedure should be communicated to HR who will report it to the CEO. The communication should be in writing and should detail the reason for the deviation and should contain clear instructions of the alternate process to follow.

5. APPENDIXES

- Appendix A - SAIL Gift Register
- Appendix B – Declaration of Interest

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JACO BEUKES
CHIEF EXECUTIVE OFFICE

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APPENDIX B

DECLARATION OF INTERESTS

It is understood that the employee will devote his/her full-time efforts during working hours towards the business of the Employer and SAIL or any of its subsidiaries and/or associated companies, and not engage in any activities that will conflict or prejudice these efforts.

In line with the Companies Act 71 of 2008, the King III as well as in terms of your employment contract with the company you are required to complete and regularly keep current, this declaration of interest in other business organisations or business organisations which are business partners of the Employer or SAIL and subsidiaries, where you may be a director, partner, member and/or co-owner, or in which you or a family member, has a financial interest and which compete or conflict with business of the Employer or SAIL and subsidiaries.

1. Declaration of Interests in other business organisations

1.1 Direct Interest

Do you have a conflict of interest(s) in legal entity(ies), organisation(s) which are business partners with, or in competition with the Employer or SAIL or any of its associate companies?

Yes

No

If you select "Yes", kindly provide details of such interests:

Name of company	Type of business of the company	State the company's relationship with the Employer and/or SAIL and / or any of its subsidiaries	State the nature of your interest in the company (i.e. are you a shareholder, a director)	If your friend / family are a shareholder of the company, the % of their financial interest



Name of company	Type of business of the company	State the company's relationship with the Employer and/or SAIL and / or any of its subsidiaries	State the nature of your interest in the company (i.e. are you a shareholder, a director)	If your friend / family are a shareholder of the company, the % of their financial interest

1.2 Indirect Interest

Does your family / friends have an interest in the legal entity(ies), organisation(s) which are business partners with, or in competition with the Employer or SAIL or any of its associate companies?

Yes

No

If you select "Yes", kindly provide details of such interests:

2. Declaration of secondary activities

Do you have any secondary activities outside of the scope of your employment with the Employer or SAIL?

Yes

No

If you select "Yes", kindly provide details of such interests below:

No.	Description of your secondary interests	What are the impacts of your secondary activity will have on your duties and obligations towards the Employer and/or SAIL and / or any of its subsidiaries	If your secondary activity will negatively affect your duties and obligations towards the Employer and/or SAIL and / or any of its subsidiaries, what are the steps and measure you will take to remedy it



1.			
2.			

The employee warrants that the information provided herein are true and correct.

The employee acknowledges that he/she is aware that Management has the right to at any time to refuse the holding of such interest(s) which are in competition with the Employer's or SAIL's interests, which the employee will then relinquish and he/she further undertakes to inform Management immediately should the above declared information change at any time.

The employee shall take all reasonable measures to guard against any conflict of interest that may arise between the best interests of the Employer and SAIL and the interest of the legal entity/organisation in which he/she is holding an interest. In the event of such conflict he/she will declare such conflict immediately to his/her Manager, update this declaration and further remove himself/herself from any decision making process which could have a bearing on this conflict of interest.

The employee undertakes to inform the Line Executive and HR of any change in the above declaration without delay.

Signed at _____ on this _____ day of _____ 2019

Signature: _____

Name: _____