



ANTI-CORRUPTION AND BRIBERY POLICY

Policy information

Policy applies to:	Lumika Renewables Group
Policy owner:	Lumika Renewables (Pty) Ltd
Policy approval:	Lumika Renewables Board
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INDEX

1	Binding Nature Of This Policy.....	3
2	Summary and Objectives	3
3	Rationale for this policy	4
4	Minimum Standards.....	4
5	What is corruption?.....	4
6	Ownership and accountability.....	5
7	Bribery and Corruption	6
8	Gifts and hospitality	6
9	Third Parties	7
10	Investments	8
11	Government Officials	8
12	Books and Records/Internal Controls.....	10
13	Specific action required from top and senior management to combat corruption.....	10
14	Recommendations to the executive	12
15	Interaction with other policies	13
16	Owner And Review	13
	ANNEXURE A SALIENT FEATURES OF SOUTH AFRICAN ANTI-CORRUPTION LEGISLATION	14
1	The general offence of corruption	14
2	Specific offences	14
3	Wide reach of legislation	14
	ANNEXURE B Bribery and Corruption Declaration Form.....	15



ANTI-CORRUPTION AND BRIBERY POLICY

1 BINDING NATURE OF THIS POLICY

- 1.1 This policy is binding on this Company from [effective date] in accordance with the Memorandum of Incorporation of the Company and the Delegation of Authority framework that applies to the Company or as adopted by the Board of the Company.

2 SUMMARY AND OBJECTIVES

- 2.1 This policy applies to the Company and sets the standards to be always complied with.
- 2.2 The Company's Board and Employees must conduct business ethically and comply with the law. All officers of the Company and Company Employees must refrain from participating in corruption.
- 2.3 Disciplinary steps will be taken against any person that does not abide by this policy.
- 2.4 The Company further requires that its business partners do not engage in corruption and will not be associated with third parties that engage in corrupt practices.
- 2.5 The policy is aligned to the Company values and elaborates on the anti-bribery and anti-corruption requirements.
- 2.6 The policy is to be reflected and implemented in the written procedures of the Company.
- 2.7 The Company:
- (a) conducts its business in a professional, fair, honest and ethical manner;
 - (b) upholds and complies with all anti-bribery and anti-corruption laws in all countries and jurisdictions in which it operates/invests for the avoidance of doubt this includes the US Foreign Corruption Practices Act, the UK Bribery Act 2010, Danish anti-corruption legislation and the Prevention and Combatting of Corrupt Activities Act No 12 of 2004 (in the interest of brevity referred to as "PRECCA")
 - (c) takes a zero-tolerance approach to bribery and corruption and to investigate instances of alleged bribery;
 - (d) implements robust and appropriate procedures to prevent bribery and corruption by anyone acting for or on behalf of the Company and train all Company Employees appropriately; and
 - (e) enforces its procedures by taking firm and timely action against any individual involved in bribery and corruption.
- 2.8 The nature of the Company's business means that it is exposed to a higher-than-average level of bribery risk. For example, the Company:
- (a) invests in infrastructure projects and energy related investments;
 - (b) engages with third parties in higher risk jurisdictions, whether these be investors, agents, customers, business partners or others; and
 - (c) may deal regularly with Government Officials.

- 2.9 The Company therefore needs to take particular care when conducting business to ensure that it does not engage in the giving or receiving of bribes or encourage bribery in any way, whether that is through any affiliate and/ or business partners.
- 2.10 The aim of this policy is to explain:
- (a) what bribery and corruption is;
 - (b) what type of conduct is not acceptable;
 - (c) how to comply with this policy and what to do if bribery/corruption is suspected; and
 - (d) the Company Employees' responsibilities in relation to record keeping, training and communication and monitoring and review.

3 RATIONALE FOR THIS POLICY

- 3.1 The consequences of participating in corruption can be far-reaching, both for an individual involved, the business involved and the Company. The purpose of this policy is therefore to combat corruption and similar behaviour by any person employed by or representing the Company, for the protection of all its employees and officers, in the interest of the long-term sustainability of the business.
- 3.2 This policy is issued pursuant to the Company's ongoing commitment to conduct business ethically, as underpinned by good governance and responsible business practices.

4 MINIMUM STANDARDS

Unless the applicable laws of a jurisdiction in which the Company operates/invests impose more stringent requirements (in which case, those more stringent requirements will apply), the following standards should, at all times, be complied with throughout the Company and its investments when conducting business.

5 WHAT IS CORRUPTION?

The following definitions apply:

- 5.1 "**Bribery**" is defined by international laws in many ways. For the purposes of this policy it means: the offering, promising, giving, accepting, or soliciting of an advantage, both directly and indirectly (e.g. through third parties) which:
- (a) is designed to influence a Government Official in their capacity as such; or
 - (b) is otherwise an inducement or reward for an action or omission by any person which is illegal, unethical, a breach of trust, a breach of a duty to act impartially or a breach of a duty to act in good faith.
- 5.2 "**CFO**" means chief financial officer of the Company
- 5.3 "**Company**" means the company that this policy has been adopted into in accordance with clause 1.
- 5.4 "**Corruption**" means the abuse of entrusted power for private gain.

- 5.5 **"Facilitation Payment"** means a small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
- 5.6 **"Government Official"** means any individual regardless of rank or title who is employed or appointed by or otherwise represents a public authority (political or non-political) which is understood to be a national, state or local government office or agency, embassy, defence/military unit, state-owned enterprise, along with any governmental (e.g. EU, UN, NATO, OECD) or quasi-governmental (e.g. WTO, IMF) organisation. For the avoidance of doubt this includes anyone who holds a judicial position of any kind, senior members of a royal family, any elected representative of any kind, employees of local authorities and government departments, employees of companies wholly owned by or controlled by a public body (e.g. port authorities) or otherwise any person holding public authority or who discharges a public service mission.
- 5.7 **"Company Employees"** means all persons working for the Company or on its behalf in any capacity, including employees at all levels, directors, officers, employees, contractors, agency workers, seconded workers, volunteers and interns.
- 5.8 **"Third Party"** means all suppliers, vendors, service providers, intermediaries, agents, business partners, external consultants, charities, advisors or entities contracted or proposed to be contracted or engaged by the Company.

6 OWNERSHIP AND ACCOUNTABILITY

- 6.1 The Company Board has overall responsibility for this policy. However, it is the responsibility of each Company Employee to comply with this policy ensuring that it is applied consistently throughout the Company.
- 6.2 It is every Company Employee's obligation to disclose any actual or potential violation to this policy to his/her manager, who must then record it and inform the CFO.
- 6.3 Any breach, or suspected breach, of this policy will be investigated by the CFO and appropriate disciplinary action taken as necessary, which may include reporting to the appropriate authorities.
- 6.4 Proven violations of provisions of this policy may lead to severe disciplinary actions taken against the offending Company Employee or Third Party. Such action could involve:
- (a) a formal reprimand;
 - (b) suspension; and/or
 - (c) termination of employment or Third-Party contracts.
- 6.5 If you have any questions about your obligations under this policy, please direct these to your manager in the first instance. However, you should always feel free to speak to the CFO in confidence about any concerns you may have.



7 BRIBERY AND CORRUPTION

- 7.1 No acts of bribery and corruption committed by a Company Employee or Third Party when providing goods and/or services to the Company, as well as representing or acting on behalf of the Company, will be tolerated.
- 7.2 Note the following:
- (a) Bribery and Corruption can take the form of Facilitation Payments, money, gifts, loans, fees, hospitality, services, discounts, job offers, the award of a contract or any other advantage or benefit;
 - (b) an advantage given as a reward after improper conduct or a job offered in exchange for improper acts is considered bribery;
 - (c) a business advantage could be something as minor as the granting of a permit or not charging a fine. A bribe need not be made; it is sufficient that it is asked for or offered or agreed to;
 - (d) accepting a bribe is as much a criminal offence as offering a bribe; and
 - (e) it is irrelevant whether something is "standard practice", "established custom" or "the way business is done" in a certain industry or country.
- 7.3 Bribery is a criminal offence. The penalties for bribery both to/ from Government Officials and to/ from private persons and companies are severe and may include imprisonment or an unlimited fine for all individuals involved and fines and reputational damage to the Company.

8 GIFTS AND HOSPITALITY

- 8.1 Giving and receiving gifts and hospitality is a risk-sensitive activity that requires careful management to avoid bribery risks and/or damage to the Company's reputation. If applied consistently, the principles and practices in this policy will help to protect the Company and Company Employees against liability.
- (a) The Company recognises that in some circumstances gifts and hospitality can be an acceptable part of business conduct. However, ensuring the Company is vigilant about what kinds of gifts and hospitality are given or accepted is fundamental to ensure the Company does not facilitate bribery and corruption.
 - (b) A Company Employee may receive a gift or item of hospitality with a value of up to USD 100. Written approval from the CFO is required to receive a gift or item of hospitality if the value exceeds this threshold. The approval and information about the gift or item of hospitality shall be recorded in the Company Gifts and Hospitality Register.
 - (c) Written approval from the CFO is required before giving a gift or a series of gifts if the value exceeds USD 100. The giving of the gift and, when necessary, the required approval should be recorded in the Company Gifts and Hospitality Register.
 - (d) All items of hospitality given should be recorded in the Company Gifts and Hospitality Register. Written approval from the CFO is required to give an item of hospitality if the value exceeds USD 100. This approval should also be recorded in the Company Gifts and Hospitality Register.

- (e) All items of gifts and hospitality to Government Officials are prohibited unless pre-approved by the CFO. Full details must be provided when seeking approval. Such approval including appropriate documentation shall be recorded in the Company Gifts and Hospitality Register.
 - (f) Repeated gifts and hospitality from/ to the same person within the same calendar year should be avoided unless there is a strong business purpose to justify it. In any event the value of all repeat items must be aggregated for the purpose of calculating the approval threshold. The CFO can grant permission to exceed the annual limit for hospitality for specific persons when business reasons justify this. Examples include Company advisors, project team members. Such permission shall be documented and recorded in the Company Gifts and Hospitality Register.
 - (g) Gifts and hospitality should always be legitimate, with a business purpose and given for the goal of furthering a business relationship. Donors should therefore always be present at any hospitality event, and this should never be extended to friends and family members of the recipients.
 - (h) Regardless of the value of the gift or hospitality, all Company Employees are expected to make a judgment call to determine if the gift or hospitality offered, given, accepted or received is legitimate, not lavish or excessive, moral and does not create an obligation on the recipient to give something in return (a quid pro quo).
 - (i) Travel or overnight accommodation should not be offered or accepted where it is provided for entertainment purposes rather than for a business purpose.
 - (j) Gifts and hospitality should never be: (i) in the form of cash or cash equivalents; (ii) of a sexual, immoral or illegal nature; or (iii) solicited from any Third Party.
 - (k) Always exercise your common sense - would this gift cause you or the Company embarrassment if it were to be reported in the press? Remember - just because a gift or hospitality is culturally acceptable in a country, this does not mean it will be deemed appropriate for the Company's standards.
 - (l) If in doubt about whether to accept a gift or hospitality, never say yes.
- 8.2 The Company CFO is responsible for approving gifts and hospitality as described above and for keeping and controlling the Company Gifts and Hospitality Register. All documentation shall be stored for five years.

9 THIRD PARTIES

- 9.1 Third Parties acting on the Company's behalf or performing services for the Company or its portfolio companies pose risks to the Company.
- 9.2 It is an offence to offer or receive a bribe via a Third Party, including a contractor, agent or other representative, or to turn a "blind eye" to any such activity.
- 9.3 The Company could be held liable, and subject to severe fines for, bribery committed by Company Employees and Third Parties while performing services for the Company.
- 9.4 The Company therefore has a responsibility to exercise due care in selecting and monitoring those acting on its behalf to prevent bribery. The use of Third Parties must be justified by a legitimate business need, risk-proportionate due diligence conducted, and the contractual



relationship fully documented. Please refer to the relevant Company processes for the instruction of Third Parties.

- 9.5 If an Employee of the Company has any concerns that a particular Third Party has breached this Policy, they should consult the CFO immediately.

10 INVESTMENTS

10.1 Transaction risk

Any new investment increases the risk exposure to the Company. The Company must understand the bribery risk associated with the relevant transaction (by reference to our business partners) and the proposed project (by reference to its operations). Once the risks are assessed appropriate measures to mitigate such risk should be included in the investment analysis documentation (risk register) and discussed with the ESG Manager, Head of Legal or CFO, as appropriate.

10.2 Business Partner Risk

- (a) The Company must conduct anti-corruption due diligence on all business partners prior to any merger, acquisition, or investment.
- (b) It is essential that all companies operate their businesses with honesty and integrity. The Company must ensure that business partners understand expectations in this regard. Primarily this should be done by ensuring appropriate provisions are included in any shareholders agreement or project agreement as appropriate. However, face to face discussions about our expectations are important.
- (c) Post-acquisition or investment, the Company will take appropriate action to ensure that the acquired company or portfolio company implements appropriate policies and procedures.

11 GOVERNMENT OFFICIALS

11.1 Interactions with Government Officials can give rise to elevated bribery risk. Therefore, any relationships between the Company (and Third Parties acting on our behalf) and Government Officials must be closely monitored to ensure the Company does not facilitate bribery and corruption or otherwise act in a way that is inconsistent with this policy.

11.2 Government Officials can be hard to identify. While it may seem obvious, it is not always apparent who qualifies as a Government Official. Each jurisdiction may also have very specific rules on interacting with local officials. Please consider this before any interactions with Government Officials.

11.3 As part of running our business, the Company may engage with governments, regulators and similar bodies in several jurisdictions. There are heightened legal and reputational risks associated with relationships with Government Officials. Company Employees are required to comply with this policy at all times.

11.4 To mitigate the risk of bribery, special care needs to be taken by Company Employees in every interaction with Government Officials, directly or through Third Parties, which includes the following instances:



(a) Gifts and hospitality

It is essential that the gifts and hospitality rules (see section 7 above) are complied with particularly so when interacting with Government Officials given the heightened risk of bribery and corruption. All items of gifts and hospitality offered to Government Officials require pre-approval from the CFO.

(b) Donations to Political Parties

Donations to political parties are prohibited.

(c) Charitable Donations and Sponsorship Projects

Charitable donations and sponsorship projects should be avoided and must be vetted by the CFO. Appropriate due diligence must be carried out to ensure that the donation: (i) is not being made directly or indirectly to Government Officials; (ii) has not been requested by Government Officials; (iii) is intended to be made to legitimate and reputable entities; and (iv) is not for the purpose of influencing a decision by a Government Official.

(d) Hiring decisions

- i) The employment, hiring, or promotion of an individual (e.g. a relative of a Government Official) shall never be undertaken with the intention of influencing a Government Official.
- ii) No one may offer employment or an internship to a Government Official (or a close relative of a Government Official) without the written approval of the CFO.
- iii) Processes must ensure that the relevant screening and/or risk assessment is made and documented prior to the hiring of any Government Official (or a close relative of a Government official).

(e) Conflict of Interest

Any relationship between a Company Employee and a Government Official who is in a position to influence the Company's business in any country must be disclosed to the Company Employee's manager and reported to the CFO.

(f) Lobbying

- i) Lobbying is the practice of individuals and organisations trying to influence the opinions and decisions of officials in positions of power. It is generally an acceptable and normal part of the legislative process, provided it is conducted in compliance with all applicable legal requirements.
- ii) Lobbying activities can only be carried out by Company Employees and Third Parties if conducted in compliance with all applicable legal requirements.
- iii) Company Employees and Third Parties must never, directly or indirectly, offer or promise any personal or improper financial or other advantage to a Government Official for the purpose of obtaining information or influencing their decision-making processes.
- iv) Company Employees who are members of trade or industry associations or who have contact with competitors at industry events or meetings should act with particular caution to ensure no matters to do with business terms or customers are discussed.

(g) Influence Peddling

It is illegal for any Company Employee to solicit or receive any advantage directly or indirectly, in order to abuse his/her influence to obtain any distinction, employment, contract or any favourable decisions from Government Officials.

(h) Disclosure of Actual or Attempted Bribes

i) If a Company Employee experiences an actual or attempted bribe, he/ she must disclose it to the Company Head of Legal or CFO immediately using the Bribery and Corruption Declaration Form, as set out in Annexure B or the anonymous Whistle Blowing Procedure.

ii) In the rare circumstance where a Company Employee may face immediate risks to their personal safety, such as extortion backed by physical threats, the individual involved should take all necessary steps to avoid personal harm. Once the Company Employee in question is able to do so, a full report should be made to the manager and the CFO by using the attached Bribery and Corruption Declaration Form in Annexure B or the anonymous Whistle Blowing Procedure.

12 BOOKS AND RECORDS/INTERNAL CONTROLS

12.1 The Company maintains a system of internal controls necessary to ensure that financial records accurately and fairly reflect our transactions and dispositions of assets; that the Company resources and assets are used only in accordance with directives and authorisations by the board of directors and senior management; and that checks and balances are employed so as to prevent the by-passing or overriding of these controls.

12.2 All financial transactions must be properly and fairly recorded. Any payments must be justified by accompanying contract, invoice and receipt. Invoices and receipts must reflect the true nature of the financial transaction. All books and records will be open to inspection by the board, auditors, internal auditors and any other party entitled to do so. There must be no "off book" or secret accounts, and no documents may be created which do not fairly and accurately reflect the transactions to which they relate.

12.3 No payment should be made where there is no proper contract or purchase order, invoice or receipt.

13 SPECIFIC ACTION REQUIRED FROM TOP AND SENIOR MANAGEMENT TO COMBAT CORRUPTION

13.1 Section 13, 14 and 15 applies to members of top and senior management (collectively referred to as "**the executive**" or "**executive team**") of the Company.

13.2 Tone at the top

(a) Values and ethical culture forms the foundation of preventing corruption in the Company and in interaction with business partners.

(b) Much of the anti-corruption legislation relates to behaviour that individuals should recognise as morally "wrong". Therefore, the risk that Company Employees will participate in corruption (or any other crime of which dishonesty is an element) is mitigated by the general

principles of ethical and values-driven governance, led by executive management. The executive is required to behave ethically at all times and to lead by example.

13.3 Duty to prevent corruption

- (a) Members of executive management, jointly and individually, have a duty to prevent corruption in the businesses they manage.
- (b) Obligation in terms of this policy: the managing director (or similar position) of the Company is required to provide annual written confirmation that they have ensured that the necessary processes are in place to comply with anti-corruption legislation and the provisions of this policy.

13.4 Prevention of corruption

- (a) The managing director (or similar position) of the Company has, with the requirements of this policy in mind, the discretion to decide on the processes, systems and controls to put in place in order to prevent participation in corruption by their employees or Third Parties associated with their business, but are obliged to address at least the matters listed below.
- (b) Obligation in terms of this policy: The Company must:
 - i) Consider the risk of corruption as part of the business' regular risk management process and to address this risk appropriately in accordance with the business' risk management policy;
 - ii) Obtain legal advice from the Head of Legal or relevant legal specialist(s) in the event that the business is unsure of the application or interpretation of local or international anti-corruption legislation;
 - iii) Implement a gift policy and gift register;
 - iv) Inform and educate relevant staff on the provisions of local and, to the extent applicable, international, anti-corruption legislation and the consequences of contraventions thereof; and
 - v) Have procedures in place requiring staff to inform the managing director of any suspected or actual contravention of anti-corruption legislation.

13.5 Duty to report corruption and crimes of dishonesty

- (a) PRECCA imposes a duty¹ on persons in a position of authority to report contraventions of PRECCA (and related crimes) involving an amount of R100 000 or more. The report must be made to a police official in the Directorate for Priority Crime Investigation.
- (b) Executives are therefore cautioned that, even if not in any way involved in corruption committed by an employee of the business, executives will nevertheless be committing an offence if the contravention of PRECCA (or other crimes involving dishonesty listed therein) is not duly reported.
- (c) Executives are required to utilise the assistance of the Head of Legal or relevant legal specialist(s) when reporting a crime or suspected crime to the Directorate of Priority Crime Investigation.
- (d) Obligation in terms of this policy: The managing director (or similar position) of the Company is required to ensure that individuals reporting to him/her are made aware of their

¹ Section 34 of PRECCA

legal duty to report actual or suspected crimes involving dishonesty as set out in PRECCA² and that this legal duty is complied with, with the assistance of the Company Head of Legal or relevant legal specialist(s).

13.6 Contravention of anti-corruption legislation

- (a) In addition to the reporting discussed above, any executive member who becomes aware of an actual or suspected contravention of anti-corruption legislation must take action to restore the business to compliance. Each member of the executive must take or support the taking of at least the actions listed below.
- (b) Obligation in terms of this policy: The following minimum actions are required in the event that anti-corruption legislation is contravened, or if contravention is suspected:
 - i) Advise the managing director (or similar position) of the Company of the contravention as soon as practically possible;
 - ii) The executive management team of the business must implement any measures deemed appropriate to prevent a recurrence of the contravention;
 - iii) The executive management team must cooperate fully with relevant law enforcers and management to investigate and resolve the matter; and
 - iv) The executive management team must ensure that appropriate disciplinary action is taken against any employee involved.
 - v) Advise the Company Head of Legal or relevant legal specialist(s) and the board of the relevant Company of the relevant facts as soon as practically possible;
 - vi) In consultation with the Company Head of Legal or relevant legal specialist(s) and the board of the relevant Company, take steps to mitigate any potential threat to business-continuity, financial loss and/or reputational damage in respect of the business.
- (c) In the event that an internal reporting requirement in this policy is to a person implicated in or suspected of corruption, the required reporting shall then be made to the implicated or suspected person's line manager or can be made with regards to the Whistle Blowing Policy.

13.7 Non-compliance with this policy

- (a) This policy is intended to assist businesses to mitigate the risk of non-compliance with anti-corruption legislation.
- (b) Disciplinary steps will be taken against any member of executive management in the relevant Company who does not comply with the requirements of this policy.

14 RECOMMENDATIONS TO THE EXECUTIVE

The obligations in this policy have been limited to generally applicable principles. The executive team of the Company is strongly encouraged, however, to take the actions below in their mitigation of the business' corruption risk:

² Offences that must be reported are contraventions of PRECCA itself (ie instances of bribery and corruption) as well as the offences of theft, fraud, extortion, forgery or uttering a forged document



- 14.1 Obtaining contractual commitments from suppliers, customers and business partners not to participate in corruption;
- 14.2 If agents are used, ensuring that the agent is reputable and that any monies paid to the agent is commensurate with the services provided by the agent;
- 14.3 Ensuring that information on the Company's whistleblowing facility is readily available, internally and externally and that Company Employees are educated thereon;
- 14.4 Providing regular, formalised training to relevant employees on the provisions of the law and the policies of the business relating to corruption; and
- 14.5 Foster openness and dialogue with material stakeholders promoting awareness and co-operation with the fight against bribery and corruption.

15 INTERACTION WITH OTHER POLICIES

Executives should bear in mind that more than one policy may apply in the event that a contravention of corruption legislation occurs, for example policies relating to communication with third parties and protected disclosures. To the extent that additional policies apply, these should be followed.

16 OWNER AND REVIEW

- 16.1 The Company Board is responsible for the implementation of this policy.
- 16.2 This policy will be updated from time to time in accordance with the governance framework of the company, its shareholders and key stakeholder expectations.

ANNEXURE A SALIENT FEATURES OF SOUTH AFRICAN ANTI-CORRUPTION LEGISLATION

1 THE GENERAL OFFENCE OF CORRUPTION

1.1 PRECCA provides³ for a “general” offence of corruption. It is illegal to:

- (a) accept (or offer or agree to accept) any gratification from any other person, whether for the individual’s own benefit or the benefit of a third party; or
- (b) give (or offer or agree to give to) any other person any gratification, whether for the benefit of that other person or a third party,

1.2 **in order to act** (personally or by influencing another) **in a manner** -

- (a) that is illegal, dishonest, unauthorised, incomplete, or biased; or
- (b) that amounts to misuse of information acquired in the course of the exercise of any powers, duties or functions arising out of a constitutional, statutory, contractual or any other legal obligation;

1.3 that amounts to-

- (a) the abuse of a position of authority;
- (b) a breach of trust; or
- (c) the violation of a legal duty or a set of rules, designed to achieve an unjustified result; or
- (d) any other unauthorised or improper inducement to do or not to do anything.

2 SPECIFIC OFFENCES

2.1 In addition to the “general” offence of corruption, PRECCA also provides for a number of “specific” offences, including, for example:

- (a) Receiving or offering unauthorised gratification to perform any duty that is within the scope of an individual’s employment;
- (b) Corrupt activities relating to contracts (whether with the private or public sector) including to improperly influence the promotion, execution or procurement of any contract;
- (c) Corrupt activities relating to the procuring and withdrawal of tenders including inducement to award a tender to a specific person, or at a specific price or to be allowed to withdraw a tender already submitted.

3 WIDE REACH OF LEGISLATION

It is worth noting that:

- (a) Even where an attempt at corruption does not have the intended result, the participating parties would still be guilty of an offence;
- (b) Even where the gratification is not given or received directly by the parties involved, but by or for a third party, the participating parties are nevertheless guilty of an offence.

³ The provisions of the legislation have been paraphrased. Please refer to PRECCA for the full definition.



ANNEXURE B BRIBERY AND CORRUPTION DECLARATION FORM

Date:

Company Employee Name:

Title or Position:

Country:

Please describe the nature of the potential bribery or corruption you have observed/experienced.	
Who has this been reported to?	
Outcome – to be completed by manager or CFO	What steps were taken to address the concern identified? (Manager) What steps were taken to address the concern identified? (CFO)
<p>I declare that the information provided above is accurate, complete and true, and that I will immediately inform the Company Head of Legal or relevant legal specialist(s) of any future changes. Further, I confirm that I will follow the Company's decision to effectively manage any instances of bribery or corruption that exist or may arise.</p> <p>Date:</p> <p>Name (block capitals):</p> <p>Signature:</p>	