

Anders TJ Incorporated
1997/006026/21
Hereinafter referred to as
“Anders Inc Attorneys” or “the Firm”

ANTI-CORRUPTION AND BRIBERY PLAN AND POLICY

Policy owner:	Directors
Department(s) impacted:	Anders Inc Attorneys consist of only one branch. It impacts the complete business
Authorized by:	Directors <ul style="list-style-type: none"> • Mr Stefanus Petrus van der Walt • Ms Theunetha Johanna van der Walt (Anders) • Ms Hlaodi Margareth Gwangwa
Date approved by Directors	January 2024

Document Publication History

Revision Date	Version	Notes	Approved by	Signature
January 2024	1.0	Original Policy	Directors	Directors Resolution

(For Internal Use Only)

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Anders Inc Attorneys is and Incorporated legal practice in terms of the Legal Practice Act, no 28 of 2014, and is committed to establishing an environment where the firm's code of conduct forms the basis for the conduct of all employees and where employees are empowered to raise matters of concern in a responsible manner.

The Firm is committed to compliance with relevant anti-bribery and corruption laws, regulations, and professional standards in all jurisdictions in which it operates and has a zero-tolerance policy towards corruption, bribery, and other improper advantages. Such practices are not tolerated within the Firm. Failure to address the risk of corruption and bribery may undermine our reputation and lead to investigations, fines and/or other penalties for the company and/or individuals.

1.1 Purpose

Anders Inc Attorneys is committed to conducting its business with honesty, integrity, and fairness, and expects all employees to maintain high standards in accordance with its policies and procedures. A culture of transparency and accountability is essential in order to prevent unlawful and unethical behaviour, and to address such behaviour it when it does occur.

This policy sets out the Firm's approach to the prevention of bribery and other forms of corruption.

1.2 Scope

This policy applies to Anders Inc Attorneys business operations and includes:

- Shareholders and Directors of the firm.
- Professional staff and Managers of the firm.
- Full-time, part-time, or temporary employees.
- Any independent contractors supporting the operations of the firm, appointed by the Directors.

We assert our influence over business partners we don't control or operate to encourage them to act in a manner consistent with our Code of Conduct. Trading partners are any third party with whom the Firm has a business relationship with or with whom a business relationship is considered are reviewed on a continuous basis.

This policy must be read in conjunction with the Whistleblowing policy, Code of Conduct and Conflict of Interest policy.

2. Approach in managing corruption and bribery risks

We do not tolerate bribery of any kind. We never offer, provide, or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual. We never request or accept bribes of any kind, either directly or indirectly.

A bribe may be monetary or non-monetary, tangible, or intangible. A bribe may take the form of, or be facilitated through:

- payments of money
- gifts or entertainment
- discounts, loans and/or financing given on non-commercial terms
- rebates or kickbacks in relation to services provided
- overpayments to business partners
- use of assets at a discount or free of charge
- sponsorships, charitable contributions, and community investments
- political contributions
- employment or internships, or
- information or assistance.

To manage our bribery and corruption risk, we implement a range of procedures and controls relating to dealings with public officials, gifts and entertainment, our business partners, sponsorships and donations, political contributions and record keeping.

We remain alert to corruption and bribery red flags and fulfil our reporting obligations.

2.1 Gifts and entertainment

The proper management of the giving and acceptance of gifts and entertainment is key to avoiding the risk they present of actual or perceived bribery or corruption.

We never make a sponsorship, charitable contribution, or community investment in order to disguise a bribe, or to gain an improper business advantage. We ensure that before we enter into sponsorships, community investments or make charitable contributions we conduct risk-based due diligence. We monitor the appropriate use of our funds or resources when required.

We only give or accept gifts and entertainment, and make a sponsorship, charitable contribution, or community investment in accordance with the Firm's Conflicts of Interest Policy.

2.2 Political funding

We do not seek to influence the political process by improper means. The Firm do not make any contribution to a political campaign, political party, political candidate, or any politically affiliated organisation.

2.3 Business partners

We expect our business partners to share our commitment to ethical and responsible business practices.

To manage our bribery and corruption exposure associated with our business partners, we implement a range of controls and processes including screening, due diligence, and monitoring, using a risk-based approach. We conduct a detailed risk-based assessment prior to entering into business partnerships, to enable us to identify, assess and mitigate any corruption risk presented by the partnerships.

We entrench appropriate compulsory anti-corruption and bribery clauses in all our contractual arrangements. Where appropriate, we also conduct ongoing monitoring.

2.4 Facilitation payment

In certain jurisdictions, public officials may request small payments, known as facilitation payments, to expedite or to secure the performance of a routine governmental action such as issuing permits, licenses, or other official documents. Facilitation payments are a form of bribery. We never pay, or authorise the payment of, facilitation payments. If we are asked to make a facilitation payment, we must not pay and we must inform the Directors immediately.

2.5 Accurate record keeping and financial accounting

We ensure all transactions are accurately recorded in accordance with our procedures and reflect the nature and substance of the transactions.

3. Reporting and whistleblowing

The Firm expects its directors, managers, employees, and contractors to speak openly and raise concerns about possible non-compliance with their manager, supervisor or via other available reporting channels. We take all concerns seriously and addresses them promptly.

There are various avenues available to report a concern as set out in the Whistleblowing Policy.

4. Training and attestation

Each subsidiary must develop training programmes for affected employees and contractors and ensure that employees complete such training.

Staff members must provide an annual attestation on the adherence to this policy.

5. Compliance with the policy

Our policies support our Code of Conduct and values as a legal practice and reflect what is important to the Firm. We take breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

All instances of non-compliance with this policy will be included within the regular risk and compliance reporting processes and reported to the relevant directors.

6. Definitions and terms used in this policy

6.1 Bribe

A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage. A bribe could be a financial

or other advantage, with the intention that a "relevant function or activity" should be performed "improperly" as a result.

6.2 Corruption

Corruption is defined as an act of accepting or offering any gratification from any other person whether for the benefit of that person or any other person in order to influence the other person to act in a manner that is illegal, dishonest, unauthorised, incomplete, biased or in a manner that results in the misuse or selling of information. This is applicable to both public officials and private individuals.

6.3 Gifts

Any items of value or benefits exchanged at no cost.

6.4 Entertainment

Any activity offered or received for free - or at less than market price - including (but not limited to) meals, travel, accommodation, sporting events, recreational activities, and hospitality.

6.5 Facilitation payment

Any payment, however small, to expedite or to secure the performance of a routine governmental action.

6.6 Public official

An officer, employee, or representative of a state or a state-controlled or -owned entity, which includes:

- any officer, employee, or representative of any national or local government institution
- any person holding a legislative, administrative, or judicial position of any kind
- any officer, employee, or representative of a public international organisation
- any officer, director, employee, or representative of any state-owned or -controlled enterprise or company
- any officer or representative of a political party
- any candidate for a political office

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