INFOGRAFRICA (PTY) LTD ANTI-BRIBERY AND ANTI-CORRUPTION (ABC) POLICY

1. Introduction

This policy ensures that Infografrica (Pty) Ltd and all its stakeholders upholds ethical standards and complies with anti-bribery and anti-corruption laws, while also providing clear guidelines on managing gifts and hospitality responsibly.

2. Scope

This policy applies to all employees, directors, officers, agents, contractors, consultants, and any third parties acting on behalf of the company.

3. Objectives

The purpose of this policy is to:

- Define the company's position on bribery and corruption.
- Set clear guidelines to ensure compliance with applicable laws (such as South Africa's Prevention and Combating of Corrupt Activities Act ("PRECCA")).
- Provide clear rules on gifts and hospitality to ensure they are not used to gain undue influence or favour.

4. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence the actions of another in the performance of their duties.
- **Corruption:** Abuse of entrusted power for private gain.

- **Gift:** Anything of value given or received without payment, including goods, services, vouchers, or entertainment.
- **Hospitality:** Any event, meal, or form of entertainment provided free or at a reduced cost.

5. Policy Statement

The company is committed to conducting its business with integrity and in compliance with all relevant anti-bribery and corruption laws. Bribery or corruption in any form is strictly prohibited. All employees and representatives of the company must:

- Not engage in any form of bribery or corruption.
- Avoid situations where their personal interests conflict with the interests of the company.

6. Legal Compliance

Employees must comply with all applicable anti-corruption laws, including:

- The Prevention and Combating of Corrupt Activities Act (PRECCA) in South Africa.
- The UK Bribery Act, U.S. Foreign Corrupt Practices Act (FCPA), or other relevant international laws where applicable.

7. Gifts and Hospitality

While the exchange of gifts and hospitality can foster goodwill in business relationships, it must never be used to influence decisions improperly.

Guidelines:

- **Acceptable Gifts:** Employees may accept gifts of nominal value (e.g., branded items, promotional items, or low-value tokens), provided they are not intended to influence any business decision.
- **Unacceptable Gifts:** Cash or cash equivalents (e.g., vouchers), gifts of substantial value, or anything that could be construed as a bribe.

- **Hospitality:** Hospitality such as meals, entertainment, and travel must be reasonable, proportionate, and aligned with the business purpose. Lavish or frequent hospitality that could influence decision-making is prohibited.
- **Disclosure:** All gifts and hospitality above the value agreed by the partners **(ZAR 1000)** must be reported to the relevant compliance officer or management.

8. Facilitation Payments

Facilitation payments (small, unofficial payments made to expedite routine governmental actions) are prohibited under this policy and many international anti-corruption laws. Employees must not make, offer, or authorize facilitation payments.

9. Political and Charitable Contributions

- **Political Contributions:** The company does not make political contributions. Employees must not make political donations on behalf of the company.
- **Charitable Contributions:** Donations to charities are allowed, but they must be transparent, approved by senior management, and not made to gain business advantage.

10. Reporting and Whistleblowing

Employees must report any suspected bribery, corruption, or unethical conduct immediately. The company has a whistleblowing policy that protects employees who report such incidents from retaliation.

10. Enforcement and Disciplinary Action

Breaches of this policy will be taken seriously and may result in disciplinary action, including dismissal, and legal action where necessary. The company reserves the right to terminate contracts with any third party acting on its behalf if they engage in bribery or corruption.

11. Training and Awareness

All employees and contractors receive regular training on anti-bribery and anti-corruption laws and this policy. New employees and contractors will be introduced to these rules as part of their onboarding process.

12. Monitoring and Review

This policy will be monitored and reviewed periodically to ensure its effectiveness and compliance with relevant laws.

Key Points for Employees:

- Do not offer or accept bribes.
- Do not give or accept gifts or hospitality that could be seen as improper.
- Report suspicious activity.
- Comply with all laws and company procedures.

13. Approval and Distribution

This policy is approved by all partners of Infografrica (Pty) Ltd and will be distributed to all relevant stakeholders, including key subcontractors and partners involved in business operations.

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14. Conclusion

Infografrica (Pty) Ltd is committed to maintaining a robust Anti-Bribery and Anti-Corruption program that ensures operational resilience and the continued delivery of high-quality services to all our clients. This policy ensures that our organization upholds ethical standards and complies with anti-bribery and anti-corruption laws, while also providing clear guidelines on managing gifts and hospitality responsibly.