



**PURCHASING CONSORTIUM
SOUTHERN AFRICA NPC**
ISO 9001:2015 certified company

**PURCHASING CONSORTIUM SOUTHERN
AFRICA**

TEL: +27(011) 545 0940

FAX: +27(011) 312 8241

E-MAIL: info@purco.co.za

COMPANY REG. NO.: 99 23 73 608

Controlled

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POLICY MANUAL

TITLE: ANTI-BRIBERY, CORRUPTION AND FRAUD

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ORIGINATOR: Cindy Grobler

SIGNATURE: *C. Grobler*

APPROVED BY: CHIEF EXECUTIVE OFFICER

SIGNATURE: *Gouws*

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1 Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that PURCO SA's business is conducted in a socially responsible manner.

2 Policy statement

Bribery can be described as:

Giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:

- gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
- payments, whether by employees or business partners such as recruiters, labour service providers or consultants; and
- other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

3 Scope

3.1 Who is covered by the policy?

In this policy, **third party** means any individual or organisation you come into contact with during the course of your engagement with us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals who are employed by PURCO SA, working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), it also applies to consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees and to all Suppliers who have been approved by PURCO SA to render services to any of its members and their employees, wherever located, (collectively referred to as **service providers** in this policy).

This policy covers:

- Bribes;
- facilitation payments.

3.2 Bribes

Service Providers must not engage in any form of bribery, either directly or through any third party (such as a supplier, an agent or distributor).

3.3 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public or University official for a routine governmental or University action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our Service Providers may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

Keep any amount to the minimum;

Create a record concerning the payment; and

Report it to your line manager.

In order to achieve our aim of not making any facilitation payments, each business of PURCO SA will keep a record of all payments made, which must be reported to PURCO SA, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

4 Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Service Providers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or PURCO SA CEO as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other Service Providers if they breach this policy.

If you wish to pay a University employee or consultant professional fees for time spent facilitating meetings PR (public relations) onboarding processes, such payment should be made against an invoice for services rendered.

5 Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

6 How to raise a concern?

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager or PURCO SA CEO.

7 What to do if you are a victim of bribery or corruption

It is important that you tell the PURCO SA CEO as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8 Protection

Service Providers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform PURCO SA immediately. If the matter is not remedied, and you are an employee, you should raise it formally using PURCO SA's Grievance Procedure.

9 Who is responsible for the policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The PURCO SA CEO has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

10 Monitoring and review

PURCO SA will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All Service Providers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Service Providers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to PURCO SA CEO.