

POLICY NAME	ANTI-BRIBERY AND CORRUPTION POLICY
POLICY APPROVED BY	Group CEO and Group Commercial Director
APPROVAL DATE	21 August 2024
POLICY EFFECTIVE DATE	21 August 2024

Objectives of the policy

The objectives of this policy are:

- To provide a clear statement to employees, forbidding any bribery or corrupt activity;
- Create awareness of responsibilities for identifying possible areas of exposure to bribery and corrupt activities and for establishing controls and procedures to prevent such activities; and
- To provide guidance as to how to report bribery and corrupt activities.

To whom does this policy apply

This policy applies to all directors, employees (including temporary and contract employees), and service providers (collectively hereinafter referred to as "Parties") of ADvTECH Limited and its subsidiaries (the "Group").

The Parties must ensure that they do not become involved, in any way, in the payment of bribes or corrupt activities. This policy sets out the minimum standards which must be adhered to at all times as well as the consequences for non-compliance.

Definitions

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.

Corruption can be described as: directly or indirectly accepting or agreeing to accept any "gratification" from another person; giving or agreeing to give any other person any gratification to influence that person directly or indirectly to exercise his power, duties or legal obligations in a manner which is/amounts to:

- Illegal, dishonest, unauthorised, incomplete or biased behaviour;
- Misuse or selling of information or material acquired;
- Abuse of position of authority;

- Breach of trust;
- Violation of a legal duty or set of rules;
- Designated to achieve an unjustified result; and
- Any other unauthorised or improper inducement to do.

The Group's Commitment

The Group is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from the Parties. This policy hereby binds the Group to its commitment to regularly discuss and mitigate factors related to any form of bribery, corruption, or fraudulent behaviour.

The Group is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented.

The Group has zero tolerance for bribery and corrupt activities. Therefore, the Group will investigate all reported suspected acts of bribery and/or corruption and if proven, will apply appropriate sanctions and refer to the relevant law enforcement agencies, such as the South African Police Services (SAPS), to institute criminal proceedings.

The Parties of the Group must adhere to the Group's ethos of anti-bribery and corruption. No Parties will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract;
- Attempt to mislead or induce any person to do something illegal or which goes against the company policy;
- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement;
- Violate any rules by shifting blame or responsibility onto another employee/person; or
- Fraudulent practices against the company ethos or legislation.

Avenues for reporting

Any evidence or a suspicion of bribery or corrupt activity must be brought to the attention of Group Internal Audit and/or Group Legal for initial investigation as soon as reasonably possible after same has been discovered.

Reporting can be done directly to the Head of Legal and Internal Group Audit Manager. Alternatively, via the ethics hotline of the Group on 0860037283 (South Africa) / +267 800 4800 110 (Botswana) / +254 800 724 796 (Kenya) / +230 802 049 0037 (Mauritius) or via email to ethicshotline@advetch.co.za

To the extent possible and practical, the Group will endeavour to maintain the confidentiality and anonymity of the report. If you fear reprisal, you should express this concern at the time of the report. In such circumstances your identity will be kept confidential.

Retaliation, retribution or harassment against anyone who in good faith reports a violation of this policy is strictly prohibited and, where applicable, constitutes grounds for disciplinary action, including dismissal.

Anyone who intentionally discloses false information knowing that the information is false with the intention to cause harm to the affected party would be guilty of an offence and be subjected to disciplinary proceedings.

Consequences of non-compliance

A breach of this policy will result in disciplinary action being taken, which may lead to dismissal, in the instances of breach by employees and directors and the service agreement/relationship being terminated in the instances of breach by a service provider.

An employee, director and service provider who contravenes this policy may also face criminal and civil action in his / her personal capacity, which criminal action may include the payment of a fine and/or imprisonment or both.

Other Policies /Reference documentation of the Group

This policy should be read in conjunction with the following:

- Code of Business Ethics Infographic
- Gift Policy
- Non-Retaliation Policy
- Code of Conduct and Business Ethics Policy
- Procurement Policy

Revision of policy

This policy is subject to discretionary review by the Group, where there are material changes to applicable laws, or, if the Group wishes to enhance or otherwise amend any aspect of the policy.