



ZERO TOLERANCE ON BRIBERY AND CORRUPTION POLICY

EOH 000 GRC POL 03

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1. Executive Summary

“At EOH we have a great leadership team and strong fundamentals and we are committed to ensuring sound corporate governance throughout our business and subsidiaries. We strive to be an ethical, relevant force for good and to play a positive role in our society, beyond normal business practice.

We have a zero-tolerance policy in respect of all forms of bribery and corruption and we will act with integrity always. We are incessantly mindful of the bribery and corruption risks facing our business and as such we choose our business partners carefully to ensure that we engage ethical intermediaries, partners and agents who will not compromise our own ethics, values and policies when they conduct business on our behalf.

As such we will continuously monitor and update our governance, risk and compliance framework and processes to ensure that they are robust and strong.”

EOH Directorate

EOH recognises that bribery and corruption is a growing concern for corporate and public life in many countries across the World. Acts of bribery and corruption are strictly prohibited by ABC laws that require companies, such as EOH, to develop comprehensive and robust ABC processes and procedures.

EOH has a ZERO tolerance policy towards bribery and corruption and any practices of criminal activity and non-adherence to applicable national or international ABC law and is committed to doing business on an ethical and sound basis.

Definitions

Term / Abbreviation	Definition
ABC	Anti-bribery and corruption
ABC law	The South African Prevention and Combating of Corrupt Activities Act, 2004, or any other national or international regulatory enactment of similar import that may have a bearing on the activities of the commercial organisation concerned
ABC risk	The risk or likelihood of a bribery and corruption incident occurring within the course and scope of a commercial organisation’s business activities
ABMS	Anti-Bribery Management System
Associated person	An “associated person” is a person who performs services for or on behalf of EOH. This person can be an individual or an incorporated or unincorporated body. The capacity in which a person performs services for or on behalf of EOH does not matter and can include employees (who are presumed to be performing services for their employer), agents and subsidiaries.

Bribery and corruption	<p>A “bribe” is the direct or indirect offer, authorization, gift or promise to give anything of value to a government/public official or any other person, with the intent to obtain or retain business or gain an improper advantage. This includes facilitation payments. For the sake of clarity, bribery and corruption include, inter-alia, the following:</p> <p>any payment or anything else of value to any official of any government or public international organization (including any officer or employee of any government department, agency or instrumentality) to influence or reward his or its decision, or to gain any other undue advantage;</p> <p>any payment or anything else of value to any representative of a private enterprise (whether for profit or otherwise) to improperly, dishonestly and outside the ordinary course of ethical business practice, influence or reward his or its decision, or to gain any other undue advantage; and</p> <p>any act or omission that constitutes a contravention of any applicable ABC Laws.</p>
Business partner	<p>Includes any third party with which EOH does business and includes, but may not be limited to, any of the following:</p> <p>suppliers;</p> <p>distributors or re-distributors;</p> <p>customers;</p> <p>sales agents;</p> <p>consultants; and</p> <p>independent contractors.</p>
Confidentiality	<p>Confidentiality involves an expectation and/or set of rules or a promise usually executed through confidentiality agreements and/or a position held that limits access or places restrictions on access and/or sharing of certain types of information</p>
Conflict of Interest	<p>A term used to describe the situation in which a person has a duty to more than one person or organization, but cannot do justice to the actual or potentially adverse interests of both parties. This includes when an individual's personal interests or concerns are inconsistent with the best interests of a customer, or when a public official's personal interests are contrary to his/her loyalty to public business and where the relationship is exploited for personal benefit, typically financial.</p>
Employee(s)	<p>All EOH employees working at all levels and grades (whether permanent, fixed-term or temporary), including directors, senior managers, officers, trainees, seconded staff, home based staff, casual staff, agency staff, volunteers and interns.</p>
Facilitation payment	<p>Facilitation payments are low value payments made to government officials to induce them to perform routine functions expeditiously.</p>
Fraud	<p>The unlawful and intentional making of a misrepresentation which causes actual and or potential prejudice to another. The use of the term is in its widest possible meaning and is intended to include all aspects of economic crime and acts of dishonesty.</p> <p>Fraud can thus be described as any conduct or behaviour</p>

	(criminal deception) and use of false representations to gain unjust advantage
Improper advantage	An “improper advantage” is broadly defined to mean something to which EOH is not clearly entitled, such as improper influence on a decision to purchase EOH products at a government institution, contract award, grant of operating permits, product registration approval, favourable court decision, or a tax dispute settlement.
Insider Knowledge	Insider trading is the trading of a public company's stock or other securities by individuals with access to non-public information about the company. In various countries, some kinds of trading based on insider information is illegal
International Sanction Lists	Sanctions are economic penalties, such as stoppage of trade and financial transactions, imposed upon a country to force compliance with another country's or United Nations (UN) or World Trade Organisations demands. Various sanctions list as re published, namely country specific sanctions, the UN Sanctions list, OFAC list etc.
PEP	A politically exposed person, which includes any current or former public official (as defined below), as well as any relative or close associate of such a person.
Proprietary Information	Proprietary Information means confidential or proprietary information, knowledge or data concerning (1) the Group's businesses, strategies, operations, financial affairs, organizational matters, personnel matters, budgets, business plans, marketing plans, studies, policies, procedures, products, ideas, processes, software systems, trade secrets and technical know-how, and other information regarding the business of the Group and (2) any matter relating to clients of the Group or other third parties having relationships with the Group. Proprietary Information may include information furnished to you orally or in writing (whatever the form or storage medium) or gathered by inspection, in each case before or after the date of this Agreement. However, Proprietary Information does not include information (1) that was or becomes generally available to you on a non-confidential basis, if the source of this information was not reasonably known to you to be bound by a duty of confidentiality, (2) that was or becomes generally available to the public or within the relevant trade or industry, other than because of a disclosure by you, directly or indirectly, or (3) that was independently developed by you without reference to any Proprietary Information
Public official	The term “public official” is interpreted very broadly around the World and covers people not only working directly for government, but also employees of government owned or controlled companies or agencies. In some countries it can be difficult to determine whether you are dealing with “public officials”. For example, a public official may be: an official or employee of a government or government owned enterprise; an official or employee of a government agency or regulatory authority; an official or employee of a political party or a political candidate; any official or employee of an international public organisation such as the United Nations, World Bank or International

	Monetary Fund; a member of the judiciary or magistracy; an individual who holds or performs the duties of an appointment, office or position created by custom or convention, including some members or royal families and some tribal leaders; a person who is, or holds themselves out to be, an authorised intermediary of a public official; a relative or associate of such public official; and Police officers, customs and tax officials, employees of state owned enterprises (“SOEs”), political party officials as well as children or other relatives of a government or political party official.
Sponsorship	A form of marketing in which a company pays for all or some of the costs associated with a project or program in exchange for a benefit. Corporations may have their logos and brand names displayed alongside the organization undertaking the project or program. Corporate sponsorships are commonly associated with non-profit groups, who generally would not be able to fund operations and activities without outside financial assistance. It is not the same as philanthropy
Trade Controls	Legislation and regulations on the import and/or export of goods and services.

2. Purpose

This policy outlines the measures which EOH has taken to prevent any form of bribery and corruption, and the procedures that should be followed if bribery or corruption occurs.

This policy further demonstrates that EOH’S top management are committed to the continual improvement of the EOH anti-bribery management system (AMBS) and to ensure a EOH culture aligned to the following:

- a. Behaviour within EOH which complies with anti-bribery and corruption legislation and regulations.
- b. Mutual respect, honesty and integrity within EOH.
- c. Responsibility to protect and be loyal to the EOH Brand.
- d. EOH Management responsibility ownership and supervision of transactions.
- e. Participation in fair competition and adherence to Anti-Trust Laws.
- f. Disclosure of Interest within Third Parties and/or Own businesses.
- g. Disclosure of exposure to political exposed persons (PEP)
- h. Acknowledgement of Customer and Supplier Policy on offering and granting advantages.
- i. Acknowledgement of Customer and Supplier Policy relating to Trade Controls.
- j. Responsibility of not demanding advantages and acting responsibly when offered advantages.
- k. Transparency of EOH gifts, donations and sponsorships.
- l. Transparency and adherence to requirements when participating in Government Tenders.
- m. Declining any form of participation in money laundering activities.

- n. Adherence to International Trade control regulations
- o. Institutionalise partner and supplier alignment of the policy.

3. Scope

This policy is applicable to all EOH, its subsidiaries, affiliates and businesses (i.e. employees, directors, executives, temporary staff members, agents, consultants) EOH service providers and EOH business associates and partners.

The Chief Executive Officer and Senior Management team of EOH will actively and visibly lead the organisation's Zero Tolerance on Corruption and Bribery policy and procedures, and ensure that these policies and procedures are implemented consistently and with clear lines of authority.

4. Objectives

EOH aims to uphold the following standards in all business activities and engagements through the implementation of the policy:

- a. Compliance with legislative and regulatory frameworks in conducting business for and on behalf of EOH
- b. Legitimate utilisation of company resources (financial and/or non-financial)
- c. Living up to the EOH Philosophies with integrity during negotiations and business activities
- d. Avoid situations that could result in conflict of interest, indebtedness or undue advantages in business dealings for or on behalf of EOH
- e. Validation of 3rd Party Policies on Ethics and Conduct including internal Gift Policies.
- f. Adherence to the Enterprise Risk Management Policy to minimise the risk of fraud, corrupt and unethical business practices
- g. Do not offer nor receive any benefit, directly or indirectly, that could result in indebtedness or undue advantage in business dealing for or on behalf of EOH, without it been declared and approved.
- h. Communicate and implement Zero Tolerance on Corruption and Bribery to avoid solicitation and any possible breach of the policy.

5. Prohibited Actions

Any acts of bribery and corruption, and/or irregular conduct are strictly prohibited by this policy.

Bribery and corruption are **strictly prohibited** by the anti-corruption provisions and regulations of both local and global laws that require EOH to develop a robust and comprehensive anti-bribery management system

What you may not do:

- a. No EOH employee or associated person may directly or indirectly bribe a government official or any other person.
- b. No EOH employee or associated person may receive anything of value in exchange for performing their duties disloyally, or in a manner that amounts to a breach of this policy or to any other illegal act.
- c. No Facilitation Payments nor acceptance of facilitation payments of any kind by EOH employees and associated persons.
- d. Participate in any dishonest, fraudulent or corrupt act.
- e. Participate in theft of funds, supplies, and/or other assets.
- f. Maladministration or financial misconduct in handling or reporting of money or financial transactions.
- g. Make a profit from insider knowledge.
- h. Non-disclosure of any Conflict of Interest.
- i. Disclosing of EOH confidential or proprietary information to outside parties.
- j. Irregularly accepting or requesting anything of a material value from contractors, suppliers, or other persons providing services and/or goods to EOH.
- k. Irregularly offering or giving anything of a material value to contractors, suppliers, or other persons providing services and/or goods to EOH.
- l. Irregularly buy /sell items banned by the International Trade Controls and/or appear on the list of controlled items, software and technologies to Customer and/or Suppliers
- m. Irregularly buy/sell to Customer and/or Suppliers on the International Sanction Lists and/ or Lists of Banned Countries, Entities and/or Persons.
- n. Destruct, remove, or abuse any of EOH records, furniture, and/or equipment without authorisation.
- o. Coerce and/or force a Person / Entity to provide a benefit in exchange of any material and/or behaving or acting in a manner that results in an unlawful benefit to the recipient.
- p. Deliberately neglect to report or act upon reports of any such irregular or dishonest conduct.
- q. Abuse of position of authority.

Exception (c)

The only exception to making a facilitation payment is when your life, health or safety is in danger (also known as an emergency payment or a duress payment). If a facilitation payment is made under such

circumstances, it must be reported to Group Compliance as soon as possible, in order that the payment can be accurately recorded in the EOH books and records.

Bribery

Bribery is the act of intentionally offering, promising or giving of an undue advantage to induce that person to act or refrain from acting in relation to performance of official duties, to obtain or retain business or other forms of improper advantage in the conduct of business.

Usually, there is a *quid pro quo*, in that both parties will benefit. For example, the public official would benefit from a bribe payment and the company would benefit from being awarded a license or concession. However, it is still bribery even if the company does not get the intended result, and your company, CEO and/or employees may still be held liable for bribery.

It does not matter if the undue advantage is transmitted indirectly using an intermediary, such as an agent, supplier or other business partner. Again, your company, CEO and/or employees may still be held liable for such bribery.

It also does not matter to whom the undue advantage is intended, if it is provided in exchange for the official to act or refrain from acting in the exercise of his official duties. Therefore, it is still bribery when the undue advantage is paid to a third party on behalf of the intended recipient, such as his/her family member, a political party, a company or a charity.

Conflict of Interest

EOH, subsidiaries and employees, associated persons and/or business partners with a direct Conflict of Interest related to the intended business need to declare upfront and openly the conflict when engaging in business for, or on behalf of EOH, especially where the decision making and/or outcome might be perceived unfavourably awarded to EOH.

Gifts, Hospitality, Entertainment, Travel and Expenses

Whilst conducting business for or on behalf of EOH, employees, associated persons and business partners may not offer to, or accept from any third parties (including, but not limited to, any public official), any gift, entertainment or hospitality that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty.

Notwithstanding the above, gifts and entertainment, such as meals or invitations to local sporting events may be offered and accepted where these are deemed to be 'reasonable' and 'proportionate' when considering the value of the gift or benefit as well as the frequency with which the gift or benefit is offered or accepted.

Gifts must be given or received openly, unconditionally and must be of modest value. For the sake of clarity, lavished and unreasonable gifts, entertainment and hospitality are prohibited (such as large cash payments, luxury goods and/or overseas trips).

When any gift, entertainment and/or hospitality is given or received by an employee or associated person, the full thereof must be recorded in the Ethics and Compliance System - Gifts Registry and approved accordingly.

Exception in respect of Municipal Officials in South Africa

Given the strict legal regulation of procurement in relation to municipalities in South Africa, EOH completely prohibits the provision of any gifts, entertainment and/or hospitality to any person acting on behalf of a municipality in relation to a procurement process. For the sake of clarity, no employee, associated person or business partner may provide any municipal employee (or person acting on behalf a municipality) any gift, entertainment and/or hospitality, if such municipal employee (or person acting on behalf a municipality) is in any way involved in a procurement process for the municipality.

Dealing with public officials

Dealing with public officials poses a particularly high risk in respect of bribery and corruption by the power vested in these officials. Furthermore, engaging in any bribery or corruption in respect of public officials is an offence in terms of the ABC laws applicable to EOH.

EOH strictly prohibits the provision of money or anything else of value, no matter how small, to any public official for influencing such official inappropriately. Notwithstanding the above, EOH recognises that the laws applicable in certain jurisdictions may provide for legitimate payments to public officials under specific circumstances, such as the payment of *per diems* (which cover daily living expenses such as travel, accommodation and food).

The following guidelines apply in respect of the payment of *per diems*:

- a. The per diem must be required to be paid by government (NOT by the public official), and clearly addressed in applicable laws;
- b. The rates must be the official rates provided for in the applicable law (and cannot be arbitrarily arrived at through negotiation);
- c. An official invoice must be received, and if this is not practicable, the official must sign for receipt of payment;
- d. Payment in cash should, as far as reasonably practicable, be avoided. Where possible, payment should be made to the service provider directly or alternatively into the official account of the government department (NOT the account of the public official); and
- e. Approval from the Chief Executive Officer is required for all per diem payments.

Sponsorship and Donations

As part of its Corporate Social Responsibility, EOH provides charitable donations on an ad hoc basis, particularly to support local communities and to serve a legitimate public purpose. Any charitable donations made by or on behalf of EOH must be approved by the Chief Executive Officer.

While EOH recognises and accepts that every individual has the right to their own political activities and opinions, political contributions, donations, gifts or sponsorships made to a politician, political party or political campaign are not permitted to be made by or on behalf of EOH.

Prohibited Sponsorship and Donations

The following sponsorships/ donations / gifts are prohibited -

- a. To individuals
- b. To profit organisations for a specific favour
- c. Into private bank accounts of individuals
- d. Where an organisation's reputation and goals conflict with those of EOH
- e. Quasi-donations, where the compensation for a service is unrelated to the value of services to be rendered.

3rd Party due diligence

EOH recognises the importance of conducting due diligence on 3rd parties. Accordingly, EOH requires a due diligence to be done in the following circumstances:

- a. When engaging with a 3rd party in respect of which there are clear reasons to believe that such 3rd party presents a higher than normal ABC risk;
- b. When commencing a business relationship with any business partner that is him or herself a PEP, and in the case of a juristic person, is owned or controlled by a PEP; and
- c. When entering into any contract with any government or organ of state (including, but not limited to, any SOE), due diligence should be done on "middle men" and/or consultants and/or agents acting on behalf of the government or organ of state.

EOH requires all business partners and stakeholders engaging with 3rd parties on its behalf to take similar precautions and to conduct due diligence on 3rd parties, where appropriate.

The nature and extent of the due diligence conducted should be based on the degree of ABC risk in the circumstances, and may be done internally or externally (where specific expertise is required). Nevertheless, the due diligence may entail one, or a combination of, the following steps:

- a. indirect investigations or general research on the 3rd party;
- b. direct request for details on the background, expertise, business experience and beneficial ownership of the 3rd party;
- c. enquiries with other customers and/or vendors who have previously worked with the 3rd party to check the references of such party; and
- d. direct interrogative enquiries specifically relating to the conduct and policies of the 3rd party.

The purpose of these steps is to assess the ABC risk of the 3rd party concerned.

6. Responsibilities

EOH must adhere to the EOH Code of conduct and all related policy provisions and ensure all annual declaration associated with the Zero Tolerance on Corruption and Bribery policy is recorded in the EOH Ethics and Compliance registers as soon as circumstances change.

Gifts, Hospitality, Entertainment, Travel and Expenses

- a. Declare **all** gifts received and/or offered on the Ethics and Compliance system within 24 hours prior to gifts been offered and/or received. Where the market value of the gift is not known a reasonable estimate of the value must be made
- b. Decline or return any gifts or benefits which are inappropriate, due to nature and/or value and/ or relationship, or where such a gift could give rise to a sense of obligation or an allegation of impropriety, or might facilitate or include behaviour that could be seen as improper benefit creation
- c. Obtain **prior** EXCO approval for gifts (events) that would have an individual market value of R10 000,00 (ten thousand rand) or more.
- d. Maintain the prescribed gift register and the Ethics and Compliance system – even where gifts were returned.
- e. Refuse any reasonable discount that could be perceived as a gift and which is not part of a formal EOH agreement and/or partnership with Customers / Suppliers

Conflict of Interest

- a. Declare all Conflict of Interest positions within 24 hours of appointment in the EOH Ethics and Compliance register
- b. Maintain annual declarations of Conflict of Interest in the EOH Ethics and Compliance register
- c. Report any breaches of the policy

Sponsorships and Donations

- a. Obtain approval from the Finance Director: Corporate for **all** payments classified as sponsorship and/or donations by submitting a completed EOH 000 GRC FRM 12 Sponsorship Form and supporting documents. Ensure the declaration of intent and authorisation of the sponsorship on all management levels to be aligned with the EOH approach on sponsorship and donations are recorded.
- b. Obtain approval from EXCO for all payments of sponsorship and donations greater than R100 000,00 (One Hundred Thousand Rand)
- c. Maintain the prescribed gift register within 24 hours of obtaining sponsorship and /or donation approval.
- d. Report any breaches of the policy.

3rd Party Due Diligence

- a. Ensure 3rd Party validation and review is performed regularly to ensure ethical partnerships and updated information for decision making.
- b. Ensure that all business partners and stakeholders engaging with 3rd parties on EOH behalf take similar precautions and conduct due diligence on their 3rd parties, where appropriate.
- c. Ensure risk assessment and/or EXCO approval where any red flags are noted.

7. Communication and Training

EOH will make this policy available to all employees, associated persons and business partners. Internally, this policy will be made available on the EOH intranet. Externally, existing business partners will be sent a copy of this policy upon its implementation and new business partners shall be informed of this policy when they are engaged.

Training on this policy will form part of the induction process for all new employees of EOH and all existing employees will receive ad hoc refresher training, when required.

All business partners are required to communicate relevant aspects of this policy to employees who conduct work for or on behalf of EOH and maintain records of acknowledgement of the obligation.

8. Implementation

EOH will communicate to all employees that they have a duty to report promptly any concerns they may have concerning the Program, whether relating to their own actions or the acts of others.

The policy is effective immediately and replaces EOH 000 GRC POL 03 Zero Tolerance on Corruption and Bribery v3.

The policy is applicable to EOH, its subsidiaries, affiliates, business partners and stakeholder of all associated transactions with customers, suppliers and partners and will be implemented according to the provisions of:

- a. The EOH Code of Conduct
- b. The EOH Zero Tolerance on Corruption and Bribery Guideline.

9. Reporting Review and Records

Any misconduct and/or report of irregular activity as defined by the policy must be reported immediately in writing to EOHEthicsandCompliance@eoh.com and the

- a. Head of Department
- b. Chief Executive Officer
- c. Group Financial Director

- d. Company Secretary
- e. Group Compliance Officer

Alternatively, you may report irregular activity anonymously via the EOH Ethics Line as follows:

EOH Ethics Line	<p>[insert local contact number here]</p> <p>[insert international contact number here]</p>	<p>Email Address:</p> <p>EOH Ethics and Compliance@eoh.com</p>
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EOH has a responsibility to take all reasonable steps to ensure that *Whistle Blowers* who disclose such information are protected from any reprisals because of such disclosure.

EOH encourages all employees, associated persons and business partners to raise concerns about any issue or suspicion of bribery and corruption without delay. "Red flag" situations that may indicate bribery or corruption are set out in the guidelines to this policy.

Where bribery and corruption is suspected, or where it occurs:

- a. All pertinent details should be recorded as soon as possible to enable the investigation thereof.
- b. Any instance of actual or potential bribery and corruption will be properly and promptly investigated.
- c. The objectives of an investigation should be to:
 - i. Confirm whether or not bribery and corruption has taken place, and to identify who was responsible;
 - ii. Confirm whether internal controls and ABC procedures have worked in practice; and
 - iii. Identify any improvements required to ABC procedures.

Depending on the findings of the investigation, remedial action will be determined. This may involve disciplinary action against employees involved or external reporting to the authorities or a regulator, whichever is appropriate.

EOH encourages openness and will fully support anyone who raises genuine concerns in good faith under this policy. EOH is committed to ensure that no one suffers any detrimental treatment because of refusing to take part in bribery and corruption, or because of reporting in good faith their suspicion that an actual or potential bribery and corruption has taken place, or may take place in future. Detrimental treatment connected with raising a concern should be reported to Senior Management immediately.



10. Policy Breach

Alleged or suspected involvement in irregular activities and/or contravention of this policy or the Code of Ethics and/or rules and regulations of EOH, by any executive, management, employee or service provider and/or supplier, will be treated in a serious manner, investigated and charged according to this policy and the EOH Disciplinary policy and procedure.

It is EOH policy that, where an employee is found guilty of bribery, corruption, fraud, or theft, / to summarily dismiss the employee. Allegations of such acts will be investigated and pursued to their logical conclusion, including legal action, criminal prosecution, and disciplinary action where warranted. Matters will be reported to the relevant authorities when there is a reporting obligation.

11. Governance Framework and Control

The policy is registered under the EOH Policy Framework as a controlled document under review of the EOH Board and any changes to the document controlled by the GRC Office and implemented by EOH management to ensure the effective application thereof must be recorded.

The policy and all supporting governance is implemented in alignment to the obligations of, but not limited to the following:

Statutory and Regulatory

RSA 12 of 2004 Prevention and Combatting of Corrupt Activities Act
RSA 38 of 2001 Financial Intelligence Centre Act
Act 121 of 1998 Prevention of Organised Crime
Act 1,29 of 1999 Public Finance Management Act
Act 26 of 2003 Local Government: Municipal Finance Management Act
Act 26 of 2000 Protected Disclosures Act
Act 71 of 2008 Companies Act
2010 UK Bribery Act
US Foreign Corrupt Activities Act
US International Anti-Bribery and Fair Competition Act
Organisation for Economic Co-operation and Development principles
Other Country specific Acts

International Standards and Best Practice Principles

ISO 9001 of 2015 Quality Management System
ISO 37001 of 2016 Anti-Bribery management system

12. Changes, Reviews and Exceptions

Request for exceptions and changes to this policy or associated governance documents must be authorised by the Executive. Such requests must be made in writing to the Executives and the GRC Manager and must be evaluated by the EOH Board based on the

case presented. Approved exceptions and/or changes will be formally communicated and recorded in the GRC Policy Framework.

The policy shall be tabled for review by the EOH Board annually or sooner should circumstances require it to ensure the continuing suitability, adequacy and effectiveness, the review should include assessing opportunities for improvement in response to changes in the legislative frameworks, organisational environment and/or business circumstances

13. Approval and Effective Date

The policy is approved on signature date and effective from signature date.

Chief Executive Officer

Date

