

[Company Name] Anti-Corruption Policy

1. Purpose

The purpose of this policy is to ensure that [Company Name] complies with the Prevention and Combating of Corrupt Activities Act (PRECCA) and to promote a culture of integrity and transparency within the organization.

2. Scope

This policy applies to all employees, directors, officers, agents, contractors, and any other third parties associated with [Company Name].

3. Policy Statement

[Company Name] is committed to conducting business in an ethical and lawful manner. We have zero tolerance for corruption and bribery in any form. All employees and associated persons must adhere to the highest standards of integrity and avoid any activities that could lead to corrupt practices.

4. Definitions

- **Corruption:** Any form of a corrupt activity as described in Chapter 2 of PRECCA, which includes unauthorised gratification.
- **Bribery:** means a form of corruption, the receiving or offering of an unauthorised gratification by or to a party to an employment relationship, which may constitute as a corrupt activity..
- **Associated Person:** Any individual or entity that performs services for or on behalf of [Company Name], including employees, agents, contractors, and suppliers.

5. Responsibilities

- **Management:** Ensure that adequate anti-corruption measures are in place and that all employees and associated persons are aware of and comply with this policy.
- **Employees and Associated Persons:** Comply with this policy and report any suspected corrupt activities.

6. Anti-Corruption Measures

- **Risk Assessment:** Conduct regular risk assessments to identify and mitigate potential corruption risks.
- **Training and Awareness:** Provide regular training on anti-corruption laws and company policies to all employees and associated persons.
- **Internal Controls:** Implement robust internal controls to detect and prevent corrupt activities.
- **Reporting Mechanisms:** Establish confidential reporting mechanisms for employees and associated persons to report suspected corruption without fear of retaliation.

7. Reporting Obligations

In accordance with Section 34A of PRECCA, any person in a position of authority within [Company Name] must report any suspected corrupt activities involving transactions of R100,000 or more to the appropriate authorities.

Employees are encouraged to report any suspicion of corruption to their manager or through the company's whistleblowing mechanism.

All reports will be investigated promptly and thoroughly.

8. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, including termination of employment or contracts, and may also lead to legal consequences.

9. Review and Monitoring

This policy will be reviewed annually and updated as necessary to ensure its effectiveness. Regular audits will be conducted to monitor compliance with this policy.

10. Contact Information

For any questions or concerns regarding this policy, please contact [Designated Compliance Officer] at [Contact Information].

This template provides a structure for developing an Anti-corruption Policy in compliance with section 34A of PRECCA. It is essential to modify this template to suit your business. No one size fits all. Please note that it is mandatory for all private sector businesses to have adequate procedures to prevent and combat corruption that may emanate from the business. Failure to have such procedures may result in massive legal, financial and reputational risks.

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