

## ANTI-BRIBERY AND CORRUPTION POLICY

### BRIBERY & CORRUPTION

Bribery refers to the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another's behalf.

Corruption refers to the abuse of entrusted power for a private gain.

### INTRODUCTION

1. SET Recruitment Consultants (Pty) Ltd values its reputation for ethical behavior and for financial profitability and reliability. It recognizes that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:
  - 1.1 Setting out a clear Anti-Bribery & Corruption Policy
  - 1.2 Training employees so that they can recognize and avoid the use of bribery by themselves and others
  - 1.3 Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
  - 1.4 Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
  - 1.5 Taking firm and vigorous action against any individual/(s) involved in bribery
  - 1.6 SET Recruitment Consultants (Pty) Ltd forbids corruption and the paying or receipt of bribes for any purpose.

### SET RECRUITMENT CONSULTANTS (PTY) LTD STRICTLY PROHIBITS:

2. Bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on behalf of SET Recruitment Consultants (Pty) Ltd
  - 2.1 Gain commercial, contractual, or regulatory advantage for the Group in a way which is unethical
  - 2.2 Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual
  - 2.3 Induce the improper performance of any function that is of a public nature, connected with a business, performed by a body, or performed by a person in the course of their employment.
  - 2.4 When acting for the Group, political contributions are not allowed, and charitable contributions are allowed only within agreed Corporate schemes and guidelines.

2.5 Facilitation payments are any payments made (except where comprise in a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement. These are not permitted or condoned by the Group.

## **DEALING WITH PUBLIC OFFICIALS**

- 3.1 Dealing with public officials poses a particularly high risk in relation to bribery due to the strict rules and regulations in many countries.
- 3.2 Public officials include those in government departments, but also employees of government owned or controlled commercial enterprises, international organizations, political parties, and political candidates.
- 3.3 Corrupting a public official is a serious offence. Therefore, the provision of money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their official capacity is prohibited. The prior written approval of the Managing Director is required in relation to:
  - 3.3.1 Gifts and hospitality in the public sector
  - 3.3.2 Making charitable contributions or political donations in connection with dealings with a public official
- 3.4 In addition, many public officials have their own rules regarding the acceptance of gifts and hospitality, etc. These rules and regulations will be respected where applicable.

SET Recruitment Consultants (Pty) Ltd acknowledges that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of ceremonial gift on a festival or at another special time
- The use of any recognized fast-track process which is available to all on payment of a fee.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with SET Recruitment Consultants (Pty) Ltd