

AfriSam (South Africa) (Pty) Ltd**Department Name: Legal, Governance, Risk & Compliance****ANTI-BRIBERY AND CORRUPTION POLICY,
GUIDELINES AND PROCEDURES**

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Compiled by:	Legal, Governance, Risk and Compliance Department
Reviewed by:	E Diack
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BACKGROUND

1.1. INTRODUCTION

AfriSam strives to conduct the day-to-day running of its business activities in accordance with the highest standards of business ethics and in line with its Code of Ethics and principles related thereto. In line with compliance best practice, AfriSam has therefore adopted this stand-alone Anti-Bribery and Corruption Policy and its incorporated Guidelines and Procedures.

1.2. PURPOSE

This document sets out AfriSam (South Africa) Pty Limited's (and its holding and associated companies') ("**AfriSam**") policy on bribery and corruption and the procedures that must be followed in order to ensure that we:

- conduct our business professionally and with integrity;
- mitigate our risks with regard to bribery and corruption;
- comply with national and international anti-bribery and corruption legislation;
- timeously report bribery and corruption to the authorities as required by law;
- conduct thorough and effective investigations;
- apply the appropriate detection and prevention controls; and
- provide information and guidance on how to prevent bribery and corruption to all our stakeholders.

1.3. APPLICABILITY

All AfriSam directors, employees, consultants, suppliers, customers, contractors and other providers of goods or services to AfriSam must comply with this policy and its procedures.

1.4. CONSEQUENCES OF NON-COMPLIANCE

A breach of this policy by any of the above parties may result in:

- Disciplinary action, which could lead to dismissal;
- Criminal action and jail sentences, where appropriate, for the individuals involved;
- Legal actions to ensure redress for any losses incurred by AfriSam as a result of the breach;
- The blacklisting of AfriSam on a public register preventing us from doing business with the public sector for 10 years; and/or
- Severe harm to our reputation.

It is thus imperative that you contact your Senior Manager, AfriSam's AfriSam Fraud and Corruption Investigator or the Legal, Governance, Risk and Compliance Department if you have or receive any questions about this document. AfriSam's Tip-Offs Anonymous is an independent and confidential system for reporting allegations of unethical behaviour, illegal acts or violations of AfriSam's Code of Conduct.

AFRISAM'S ANTI-BRIBERY AND CORRUPTION POLICY

The adoption and maintenance of high ethical business standards is one of AfriSam's core principles. It is therefore company policy to fight bribery and corruption and we expect those in our employ, and anyone with whom we transact or interact, to do the same.

In so doing, we are dedicated to aligning with best practice and complying with all relevant legislation applicable to the prevention of bribery and corrupt activities within South Africa and abroad.

In this regard, and so as to ensure that we effectively mitigate our risk in this regard, AfriSam is committed to conducting its business activities in line with the following fundamental principles:

- We do not engage in bribery and corruption.
- We do not pay facilitation fees.
- We keep proper records of dealings with third parties.
- We conduct due diligence on relevant third parties
- We investigate, and report claims of bribery and corruption without fear or favour.
- We protect those who responsibly disclose bribery and corruption.
- We train our employees on their compliance obligations.

Eric Diack
CEO
AfriSam (South Africa) (Pty) Ltd

UNDERSTANDING THE PRINCIPLES OF AFRISAM’S POLICY

1.5. WE DO NOT ENGAGE IN BRIBERY AND CORRUPTION

<p>What is “corruption”?</p>	<p>Corruption is considered to be any abuse of public or private office for personal gain. Corruption amounts to any unauthorised or improper inducement to do or not to do anything.</p>
<p>What is “bribery”?</p>	<p>Bribery is a particular form of corruption where an inducement or reward, also known as a gratification, is offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage through “improper performance”. “Improper performance” occurs when a person fails to act</p> <ul style="list-style-type: none"> • in good faith; • impartially; or • in accordance with a position of trust or fiduciary duty. <p>Note that both the giver and the receiver of the bribe is committing an offence.</p>
<p>Note!</p>	<p>It is an offence to directly or indirectly bribe another person (including a public official) or to accept a bribe. Bribery includes:</p> <ul style="list-style-type: none"> • offering an inducement or reward to a public official to influence or reward a decision, or to gain any other improper advantage; and/or • offering an inducement or reward 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 a decision, or to gain any other improper advantage.
<p>What is considered to be an “inducement”/“reward” or “gratification”?</p>	<p>An inducement, reward, or a gratification includes anything of value or pleasure – tangible or intangible – and includes:</p> <ul style="list-style-type: none"> • money, whether in cash or otherwise; • any donation, gift, loan, fee, reward, valuable security, property or interest in property of any description, whether movable or immovable, or any other similar advantage; • the avoidance of a loss, liability, penalty, forfeiture, punishment or other disadvantage; • Any office, status, honour, employment, contract of employment or services; • any agreement to give employment or render services in any capacity and residential or holiday accommodation; • any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part; • any forbearance to demand any money or monies’ worth or valuable things;

<p>Note!</p>	<ul style="list-style-type: none"> • any other service or favour or advantage of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and includes the exercise of the forbearance from the exercise of any right or any official power or duties; • any right or privilege; • any real or pretended aid, vote, consent, influence or abstention from voting; and/or • any valuable consideration or benefit of any kind, including any discount, commission, rebate, bonus, deduction or percentage. <p>You may also not use a third party as a conduit to conceal the paying or receiving of a bribe. Third parties include:</p> <ul style="list-style-type: none"> • family members • actual and potential customers • suppliers • distributors • business contacts • agents • advisers • government and public bodies, including their advisers, representatives and officials • politicians and political parties
<p>Does this mean you may never accept a gift from a third party?</p>	<p>No. This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties that are given and received in accordance with AfriSam’s Procedure for Governing Gifts and Courtesies. In particular, the gift may not:</p> <ul style="list-style-type: none"> • be given/received in order to obtain a business favour for/from you, AfriSam or a third party; • be accompanied by any direct or indirect suggestion, hint, “understanding” or implication that some expected or desirable outcome is required in return; or • be intended to act as an improper incentive or to exert an improper influence on you, for example, to influence the decision to do business with the giver. <p>Refer to the Procedure for Governing Gifts and Courtesies for more detail on the procedures that must be followed when you receive or give a gift.</p>
<p>What about donations and sponsorships?</p>	<p>We never provide donations or sponsorships in order to gain a commercial, contractual, regulatory or personal advantage through “improper performance”, i.e. as a bribe. Refer to AfriSam Donations Policy and Managing Events and Conferences Policy.</p>
<p>Note!</p>	<p>You may never accept or offer cash payments and cash equivalents (coupons/vouchers/gift cards).</p>

All gifts to **government officials, agents or representatives, or politicians or political parties** must be dealt with in compliance with the **AfriSam’s Donations Policy**.

1.6. WE DO NOT PAY FACILITATION FEES

What is a “facilitation fee”?	Facilitation payments are typically, unofficial payments made to secure or expedite a routine government action by a government official. These payments are also known as “grease payments” or “kick-backs”.
Why may we not pay or receive facilitation fees?	It is illegal. You may not make facilitation payments or permit third parties to make such payments on behalf of AfriSam.
Note!	You may only pay a facilitation fee if non-payment may endanger your life or lead to damage to an asset of AfriSam. These circumstances are highly unlikely and exceptional. If this happens, you must follow the procedure set out further below.
What records must be kept?	Accurate and updated written record must be kept of <ul style="list-style-type: none"> • expense claims relating to hospitality, gifts or expenses incurred to third parties; • accounts, invoices, memoranda and other documents and records relating to dealings with third parties; • all gifts need to be reflected in the central/regional gift and courtesy register and be approved by line management. Refer to the Procedure for Governing Gifts and Courtesies for detail the value of the gifts that should be declared. <p>No accounts must be kept "off-book" to facilitate or conceal improper payments.</p>
Why is it important to keep records?	These records will assist us to provide evidence of the business reason for making payments to third parties.

1.7. WE CONDUCT DUE DILIGENCE ON RELEVANT THIRD PARTIES

What is meant by “due diligence”?	Due diligence is an information gathering and verification process that enable us to know our third-party service providers; understand the nature of the business they do with their clients and to identify suspicious business conduct.
Who is a relevant third party?	This refers to any third party with which AfriSam does business and includes, but may not be limited to, any of the following: <ul style="list-style-type: none"> • suppliers

	<ul style="list-style-type: none"> • distributors or re-distributors • customers • sales agents • consultants • independent contractors
<p>When must a due diligence be done on a third-party service provider?</p>	<p>AfriSam requires a due diligence to be done on an ad hoc basis and in accordance with the provisions of Finance Department Procurement Procedure No FPP 01 and its applicable Credit Control procedures in the following circumstances (as may be applicable, having regard to the specifics of the foregoing procedures):</p> <ul style="list-style-type: none"> • when engaging a third party with a view to establishing a joint venture or partnership arrangement; • when engaging with a third party in respect of which, having regard to the supporting documents provided by such third party in accordance with AfriSam’s Procurement or Credit Application processes, there are clear reasons to believe that such third party presents a higher than normal risk or likelihood of a bribery and corruption incident occurring within the course and scope of business activities; • when commencing a business relationship with any business partner that is a Politically Influential Person (“PIP”) or Politically Exposed Person (“PEP”), and in the case of a juristic person, is owned or controlled by a PIP/PEP as reflected in the supporting documents provided by such third party; and • 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. <p>AfriSam requires business partners and stakeholders engaging with third parties on its behalf to take similar precautions and to conduct due diligence on these parties, where appropriate.</p>
<p>Who is a “PIP”/“PEP”?</p>	<p>A PIP/PEP includes any current or former public official, as well as any relative or close associate of such a person.</p>
<p>What should the due diligence entail?</p>	<p>From a Procurement perspective, the nature and extent of the due diligence to be conducted applies to suppliers/service providers where AfriSam’s has gone out on a formal tender (that is, where spend is over R500 000).</p> <p>In line with Finance Department - Procurement Procedure No FPP 01, and in terms of the provisions of the applicable Credit Control procedures read with AfriSam’s Credit Application, the</p>

	<p>due diligence may entail one, or a combination of, the following steps –</p> <ul style="list-style-type: none"> • indirect investigations or general research on the third party; • direct request for details on the background, expertise, business experience and beneficial ownership of the third party; • enquiries with other customers and/or vendors who have previously worked with the third party to check the references of such party; and • direct interrogative enquiries specifically relating to the conduct and policies of the third party, on an ad hoc basis following the assessment of the supporting documents provided.
<p>Who should do the due diligence?</p>	<p>The due diligence may be done internally or by external parties where specific expertise is required.</p>

1.8. WE INVESTIGATE, AND REPORT CLAIMS OF BRIBERY AND CORRUPTION WITHOUT FEAR OF FAVOUR

<p>Who must report bribery and corruption?</p>	<p>The prevention, detection and reporting of bribery and corruption are the responsibility of all those working for us or under our control, our shareholders, directors, consultants, vendors, contractors, outside agencies, customers and/or parties who do business with us.</p> <p>It is important that you report it as soon as reasonably 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.</p> <p>In short: You should report any suspicious person or conduct.</p> <p>South African law requires that an individual in a position of authority who has knowledge or suspicion of an offence has a duty to report this to the relevant authority.</p>
<p>Who is likely to be a “suspicious person”?</p>	<p>A suspicious person is any third party whom you suspect or learn</p> <ul style="list-style-type: none"> • engages in, or has been accused of engaging in, improper business practices; • has a reputation for <ul style="list-style-type: none"> – paying or receiving bribes, or

	<ul style="list-style-type: none"> – having a “special” or “unique” relationship with foreign or local government officials.
<p>What is “suspicious conduct”?</p>	<p>Suspicious conduct includes instances where a third party:</p> <ul style="list-style-type: none"> • insists on receiving entertainment, gifts, a commission or fee before: <ul style="list-style-type: none"> – committing to enter into a contract with us, or – carrying out a government function or process for us; or – facilitating or assisting us with a service; • requests that payment is made: <ul style="list-style-type: none"> – in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made; – to a country or geographic location different from where the third party resides or conducts business; – to overlook or ignore potential legal violations; • requests that you provide employment or some other advantage to a friend or relative; • refuses to put terms agreed in writing; • offers you: <ul style="list-style-type: none"> – gifts or hospitality that are unusually generous, immoderate or extravagant; – hospitality that extends to persons beyond our business (for example family members); – hospitality at which the giver is not going to be in attendance; • requests you to give hospitality: <ul style="list-style-type: none"> – at which you are requested not to attend; – to persons who are not associated with the organisation (for example family members); • sends you an invoice that appears to be: <ul style="list-style-type: none"> – non-standard or customised; – large given the service stated to have been provided.
<p>Note!</p>	<p>The lists above consist of possible scenarios that may arise during the course of you working for AfriSam and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only to assist you in complying with this policy.</p>
<p>How must you report suspicion of bribery and corruption?</p>	<p>AfriSam encourages employees to adhere to the obligation to report any act of bribery and corruption by following the procedures in this document.</p>
<p>When do we investigate bribery and corruption?</p>	<p>We investigate all claims of bribery and corruption that are reported in the appropriate manner.</p>

	<p>Do not:</p> <ul style="list-style-type: none"> • personally conduct investigations or interviews / interrogations; or • contact the suspected individual in an effort to determine facts or demand restitution. <p>Refer to the reporting procedures set out in this document on how to report suspicions of bribery and corruption.</p>
<p>What do we mean by “without fear or favour”?</p>	<p>All reports of bribery and corruption will be treated consistently without regard to positions held or length of service or relationship with the AfriSam. Our Disciplinary Procedure will be strictly adhered to at all times.</p>
<p>Who investigates allegations of bribery and corruption at AfriSam?</p>	<p>The AfriSam Fraud and Corruption Investigator, whose details appear in section 4.2 hereof, in conjunction with the relevant senior member of management, have the primary responsibility to co-ordinate the investigation of all suspected fraudulent acts reported under this policy, including the appointment of any suitable service provider to conduct an investigation.</p>
<p>Note!</p>	<p>It is important to remember the following:</p> <ul style="list-style-type: none"> • When investigating allegations of bribery and corruption, compliance with all local legal requirements is vital. • The AfriSam Fraud and Corruption Investigator must be consulted before contact is made with any alleged perpetrator. • Any agreements to forgo any or all criminal and civil action must be approved by AfriSam Fraud and Corruption Investigator • The rights of alleged perpetrators and others should be recognised and protected.

1.9. WE PROTECT THOSE RESPONSIBLY DISCLOSE BRIBERY AND CORRUPTION

<p>Who do we protect?</p>	<p>In line with AfriSam’s Protection of Whistle Blowers Policy, we protect anyone who, in good faith,</p> <ul style="list-style-type: none"> • refuses to accept or offer a bribe; and • raises concerns; or • reports another’s wrongdoing. <p>We do this even if it turns out the person had (in good faith) made a mistake.</p>
<p>What do we mean by “responsibly disclosing”?</p>	<p>We only protect those employees and other stakeholders who have</p>

<p>What does it mean to disclose in “good faith”?</p>	<ul style="list-style-type: none"> • disclosed their identity; • followed the reporting process in this policy; • reported in good faith. <p>Good faith is the sincere belief or motive without any malice or the desire to defraud others. It requires that you come forward with all the information you have about a situation that you believe violates the law or our policies and be motivated by a genuine concern or suspicion that criminal or irregular conduct is occurring.</p> <p>Bad faith is intentional or malicious deceit, for instance where the person making the report knowingly provides false information or where the person attempts to unduly taint the image of a person or organisation to gain some advantage.</p>
<p>Note!</p>	<p>This protection does not apply to those employees and other stakeholders who have opted to disclose information based on their own irregular conduct.</p> <p>Therefore, while whistle blower is protected against any form of retaliation occurring as a result of his/her tipping-off in good faith he or she is not protected from actions associated with any direct involvement in the matter reported.</p> <p>Any employee, who makes allegations maliciously, for personal gain, or reward, will not be protected in terms of the law and this policy. Any disclosures made with ulterior motives is investigated through the AfriSam Fraud and Corruption Investigator and included in the "Fraud Report" to the Audit, Risk & Compliance Committee.</p>
<p>Why do we protect those who report?</p>	<p>We aim to encourage openness and will support anyone who raises genuine concerns.</p>
<p>How do we protect those who report bribery and corruption?</p>	<p>In order to ensure that employees are not afraid to report suspected and actual fraud, employees will not be subjected to detrimental treatment or victimisation by AfriSam on account of having made a disclosure that is made in accordance with the procedure set out in this document.</p> <p>Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.</p> <p>Information relating to bribery or corruption that is received and reported to any Manager or an Executive Committee Member shall be treated with the utmost confidentiality and in line with the Protected Disclosures Act, 26 of 2000.</p> <p>The progression of the investigation will be handled in a confidential manner and will not be disclosed or discussed with any other person(s) other than those who have a legitimate right to such information.</p> <p>This is important in order to avoid harming the reputations of the suspected person(s) who may be subsequently found innocent of any wrongful conduct.</p>

1.10. WE TRAIN OUR EMPLOYEES ON THEIR COMPLIANCE OBLIGATIONS

<p>Why do we train our employees?</p>	<p>Employees are required to acquaint themselves with this policy and its procedures and to participate in the training sessions organised by the company to raise awareness of the fight against corruption.</p>
<p>Who is responsible for facilitating training of employees on this policy?</p>	<p>The Legal, Governance, Risk and Compliance Department will facilitate the appropriate training on the content of this policy and its procedures, and the Line Manager will be responsible for assuring that the employee attend to such training.</p> <p>It is the responsibility of each Manager to ensure that all employees, consultants, suppliers, contractors and other providers of goods or services to AfriSam are made aware of and if appropriate, receive training and education with regard to this policy and procedure.</p>
<p>How often do we train our employees?</p>	<p>New employees are made aware of the content of this policy immediately upon assuming their duties within the company. All employees, other than new employees, are trained every two years.</p>

IMPLEMENTING OUR POLICY: PROCEDURES

In line with best practice recommendations regarding clear, practical and accessible procedures to prevent corruption, AfriSam sets out below the applicable Procedures in terms of which its Policy is implemented:

1.11. PROCEDURE: DEALING WITH EMERGENCY FACILITATION FEES

<p>What should you do in the unlikely event of having to pay a facilitation fee?</p>	<p>In the unlikely event that the non-payment of a facilitation fee may result in harm to you or any AfriSam property or asset, do the following:</p> <p>Step 1: Pay the fee – never put yourself in any danger.</p> <p>Step 2: Report the incident, date and amount paid to your Line Manager or Compliance Officer as soon as possible.</p> <p>Step 3: The Line Manager or Compliance Officer must report the incident to the AfriSam Legal, Governance, Risk and Compliance Department as soon as possible.</p> <p>If you are unsure, you must seek clarification, guidance and authorisation from your Line Manager.</p>
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1.12. PROCEDURE: REPORTING OF NON-COMPLIANCE WITH THIS POLICY

<p>Step 1: Report it internally</p>	<p>Report any act of bribery and corruption to your immediate Manager or to AfriSam Fraud and Corruption Investigator.</p> <p>Name: Fraud and Corruption Investigator Cell: 083 252 1279 E-mail: report.fraudandcorruption@za.afrisam.com</p> <p>Use the following contact details for anonymous reporting: All employees are encouraged to report all suspected and actual bribery or corruption anonymously through AfriSam’s Tip-Offs Anonymous, which details will be displayed at all of AfriSam’s business premises. The following contact details are relevant: Tip-Offs Anonymous E-mail: afrisam@tip-offs.com Website: www.tip-offs.co.za SA FreeCall: 0800 00 48 29 SA FreeFax: 0800 00 77 88 SA FreePost: KZN 138, Umhlanga Rocks, 4320 International Hotline number: +27 31 571 5368 Botswana FreeCall: 0800 600 644</p>
<p>Step 2: Investigate</p>	<p>AfriSam Fraud and Corruption Investigator in conjunction with the relevant Senior Manager have the primary responsibility to co-ordinate the investigation of all suspected fraudulent or corrupt acts reported under this procedure and to keep a detailed register of such activities.</p>
<p>Step 3: Escalate if required</p>	<p>AfriSam’s Fraud and Corruption Investigator will escalate a claim of bribery and corruption to:</p> <ul style="list-style-type: none"> • notify the relevant Audit, Risk and Compliance Committee, should it be found that a significant fraudulent or corrupt activity/ies have occurred • provide the assurance to the Safety, Social and Ethics Committee that the design of the controls for prevention and detection of fraud and corruption within AfriSam is adequate and intact. <p>Any corrupt transaction to be reported to the Police in the Directorate for Priority Crime Investigation by should be done by the Responsible Line Manager (General Manager equivalent or above), under guidance from the Legal, Governance, Risk and Compliance Department.</p>
<p>Step 4: Implement consequences</p>	<p>Follow the process in terms of our Disciplinary Procedure.</p>
<p>Step 5: Record</p>	<p>Details regarding the incidents will be reported to AfriSam’s Fraud and Corruption Investigator by virtue of this Procedure</p>

	and through his desk to the Audit Risk & Compliance Committee and effectively the Board. Full details of these investigations are recorded in the Forensic Reports issued and in the underlying investigation records for each case.
Step 6: Review controls	Executive Committee members to immediately review the controls which have been breached in order to prevent similar irregularities from taking place in future. AfriSam’s internal auditors should be consulted when necessary for assistance in this regard.
What should you do if you suffer any harm due to reporting bribery and corruption?	If you are an employee, you should raise a complaint formally in accordance with the AfriSam Grievance Handling Procedure found on the Intranet.

1.13. IMPORTANT

Who is ultimately responsible for compliance with this policy?	The Chief Executive Officer is responsible for ensuring that this policy and procedures are: <ul style="list-style-type: none"> • communicated and understood; • observed and complied with; and must foster an open environment for employees to discuss possible violations.
What other documents should you read?	This policy should be read and implemented in conjunction with and consideration of the following relevant policies: <ul style="list-style-type: none"> • AfriSam Donations Policy • AfriSam Procedure for Governing Gifts and Courtesies • AfriSam Conflict of Interest Policy • AfriSam Code of Conduct • AfriSam Fraud and Irregular Conduct Policy • AfriSam Disciplinary Procedure
Where can these documents be found?	These documents can be found on the Intranet.

RECORDS

Records generated as a result of this procedure are as follows:

Record	Location/Custodian	Retention Time	Disposition
Supporting documents submitted together with a report to the Directorate for Priority Crime Investigation	AfriSam Fraud and Corruption Investigator	5 years	Shred/Delete/Destroy

AMENDMENTS

Date	Rev	Reason for Change	Changed by
15/11/21	0	New Procedure	LGRC

DISTRIBUTION LIST

This procedure will be distributed to all Company employees and saved on the Intranet.

REFERENCES

As set out in section 4.3 above.