

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 1 of 8

MEATCO ANTI BRIBERY AND CORRUPTION POLICY

24/07/18		First Revision	I Brown	JH Breytenbach	Meatco Exco
Date	Revision	Description of Revision	Prepared	Checked	Approved

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 2 of 8

This document is the property of Meatco Namibia who will safeguard its rights according to the civil and penal provisions of the law

Please refer any queries regarding this document to the authors listed below:

Name	Role	Contact Details
Ilana Brown	Acting CFO	061 321 6423
Jannie Breytenbach	Acting CEO	061 321 6421

Revisions

Date	Version	Changes	Author

Approvals

Name:			
Designation			
Signature:		Date:	

Name:			
Designation			
Signature:		Date:	

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 3 of 8

Contents

1.	Introduction	4
2.	Purpose and scope	4
3.	Legal obligations	4
4.	Policy	5
5.	Responsibilities and reporting procedure	6
6.	Record-keeping	7
7.	Register of Interests	7
8.	Sanctions for breach	8
9.	Monitoring compliance	8
10.	Training	8

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 4 of 8

1. Introduction

One of the Corporation's core values is to uphold sound, responsible and fair business operations. It is committed to promoting and maintaining the highest possible ethical standards in relation to all of its business activities. The Corporation's reputation for maintaining lawful business practices is of paramount importance and this policy is designed to preserve these values. The Corporation therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships, wherever it operates, by implementing and enforcing effective systems to counter bribery.

2. Purpose and scope

This policy sets out the Corporation's position on any form of bribery and corruption and provides guidelines aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations in any country within which the Corporation may carry out its business or in relation to which its business may be connected.
- Enabling directors, employees and persons associated with the Corporation to understand risks associated with unlawful conduct and to enable and encourage them to be vigilant and to effectively recognise, prevent, avoid and report any wrongdoing, whether by themselves or others.
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or other unethical conduct.

This policy applies to all directors and employees of the Corporation (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Corporation or who performs functions in relation to, or for and on behalf of, the Corporation, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").

All employees and associated persons are expected to adhere to the principles set out in this policy.

3. Legal obligations

The key legislation on which this policy is based is the Namibian Anti-corruption Act 2003, which is considered best practice, and it applies to the Corporation's conduct in Namibia, and any country in which the Corporation conducts its activities.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 5 of 8

It is an offence in most jurisdictions to:

- Offer, promise or give a financial or other advantage to another person (i.e. bribe a person) whether within the country or abroad, with the intention of inducing or rewarding improper conduct.
- Request, agree to receive, or accept a financial or other advantage (i.e. receive a bribe) for, or in relation to improper conduct.
- Bribe a foreign public official outside one's normal jurisdiction.

You can be held personally liable for any such an offence.

It is also an offence for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Corporation. The Corporation can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could also suffer substantial reputational damage in connection with an offence.

4. Policy

All employees and associated persons are required to:

- Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold the Corporation's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

The Corporation recognises that business practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this policy is expected of all employees and associated persons at all times.

If in doubt as to what might amount to bribery or other unethical conduct or might constitute a breach of this policy, you should refer the matter to your line manager or (to be *NOMINATED*), the Corporation's Anti-Corruption Officer.

For the Corporation's rules and procedures in relation to the receipt of business gifts from third parties such as clients, customers, contractors and suppliers and corporate hospitality offered to or received from such third parties, please refer to the Corporation's Receipt of Gifts and Corporate Hospitality Policy, Procurement Policy and Delegation of Authority. These policies and procedures form part of the Corporation's zero tolerance policy towards any form of bribery and should be read in conjunction with this policy.

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 6 of 8

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage.
- It complies with local laws.
- It is given in the Corporation's name, not in the giver's personal name.
- It does not include cash or a cash equivalent (such as gift vouchers).
- It is of an appropriate and reasonable type and value and given at an appropriate time.
- It is given openly, not secretly.
- It is approved in advance by a Director of the Corporation.

Essentially, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

For the avoidance of doubt, any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited.

5. Responsibilities and reporting procedure

It is the contractual duty and responsibility of all directors, employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out in the Corporation's Public Interest Disclosure Policy. Such a person must immediately disclose to the Corporation any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Corporation. For the avoidance of doubt, this includes reporting your own wrongdoing.

The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Corporation but applies equally to all employees and associated persons.

The Corporation encourages all employees and associated persons to be vigilant and to report any inappropriate or unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. For example, if a client or potential client offers you something to gain a business advantage with the Corporation or indicates to you that a gift or payment is required to secure their business.

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 7 of 8

In the event that you wish to report an instance or suspected instance of bribery, you should follow the steps set out in the Corporation's Public Interest Disclosure Policy. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Corporation is committed to taking appropriate action against bribery or other unethical conduct. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Corporation will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

All employees and associated persons must ensure that any contract or agreement entered into by them, for or, on behalf of the Corporation contains an appropriate clause aimed at ensuring that any third party to the contract is aware of and agrees to adhere to the contents of this policy and further, that the contract expressly sets out the consequences of non-compliance including, where appropriate, clear provision for terminating the contract in the event of non-compliance or the commission of any relevant bribery offence.

6. Record-keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

7. Register of Interests

The Corporation recognises that directors and employees may from time to time be involved in external business or political activities or have close personal relationships with individuals who are involved in such external activities that are or may reasonably be perceived to be in conflict with the activities of the corporation. The Anti-Corruption Officer, on behalf of the corporation, will maintain a Register of Interests whereby, in the interests of transparency and to ensure that all such conflicts, whether real, potential or may reasonably be interpreted as such, are recorded. The Register will be reviewed periodically by the Audit and Risk Committee. All directors and members of the executive management team must notify the corporation of any interest at the earliest opportunity when any conflict or potential conflict arises. It will be the responsibility of the individual director or executive officer to declare their interests when any such conflict or potential conflict may arise. Whilst such conflict arises the director or officer will absent or recuse themselves from any discussion and decisions pertain to the matter on which they are conflicted. The Audit Committee will adjudicate on resolution of conflict of interest matters and ensure that they are satisfactorily addressed in a timeous manner.

MEATCO ANTI BRIBERY & CORRUPTION POLICY: DRAFT	Document No: MEATCO2018-06		
	Revision:	Date: 27/07/2018	Page 8 of 8

8. Sanctions for breach

Breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with the Corporation's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the director or employee liable to summary dismissal.

As far as associated persons are concerned, breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement with the associated person.

9. Monitoring compliance

The Corporation's Anti-Corruption Officer has lead responsibility for ensuring compliance with this policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Directors of the Corporation who have overall responsibility for ensuring this policy complies with the Corporation's legal and ethical obligations.

10. Training

The Corporation will provide training to all employees to help them understand their duties and responsibilities under this policy.

The Corporation's zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

11. Examples of potential risks

The following is a non-exhaustive list of possible issues which may raise bribery concerns and which you should report in accordance with the reporting procedure set out above:

- A third party insists on receiving a commission or fee before committing to signing a contract with the Corporation, or carrying out a government function or process for the Corporation.
- A third party requests payment in cash, or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- A third party requests an unexpected additional commission or fee to facilitate a service.
- A third party demands lavish, extraordinary or excessive gifts or hospitality before commencing or continuing contractual negotiations or provision of services.
- You are offered an unusually lavish, extraordinary or excessive gift or hospitality by a third party.
- You receive an invoice from a third party that appears to be non-standard or extraordinary.
- The Corporation is invoiced for a commission or fee payment that appears large given the service stated to have been provided.