

Human Resource Management
Gifts and Bribes Policy
Authorised by: Chief People Officer

Scope

This policy sets out the Company's approach regarding receiving and giving of gifts, bribes, and payments through which one person gains a dishonest advantage over another.

Introduction

The distinction between a gift and a bribe is very fine. A gift becomes a bribe when the receiver feels obligated to do business with the giver because of the gift.

Acceptable gifts

The receipt of gifts from suppliers and business associates is to be discouraged. However, on disclosure employees may accept gifts which comply with the following criteria:

- Lunches or meals
- Gifts which can be used in the office (calendars, desk pads, pens bearing a logo, etc.)
- Food or drink of a reasonable nature (single bottles of wine, boxes of chocolates, etc.)

Gifts should be of a value of R100 or less so that the employee does not feel obligated to the giver. All gifts received should be disclosed to the employee's immediate manager or supervisor. MTO Forestry (PTY) LTD reserves the right to take disciplinary action with regard to employees receiving gifts that are not disclosed.

The giving of gifts to customers must be approved by the Manager or Director and must be in line with the customer's gift receiving policy. All gifts given must carry the MTO Forestry (PTY) LTD logo and signage.

Entertainment of a client must be pre-approved by the Manager or Director and must have a clear business purpose.

Fraud and Corruption

These are serious offences which can result in criminal conviction. In terms of the new Corruption Act 12 of 2004, it is a criminal offence for an employer not to report corruption, theft or fraud or a suspicion of the mentioned offences in excess of R100 000 to the police.

Fraud and corruption in these terms are defined as the acceptance of bribes, receiving of money, goods or services for personal gain which are not disclosed to the company.

Equally any company or employee of a company who gives bribes of money, goods or services to gain a business advantage is considered to have committed a criminal offence in terms of the Corruption Act.

Fraud and corruption, or attempted fraud and corruption are breaches of acceptable standards of conduct required of employees. This will not be condoned by MTO Forestry (PTY) LTD.

Where MTO Forestry (PTY) LTD suffers a loss, steps will be taken against the employee to mitigate the loss.

Any fraud and corruption can be reported by an employee in terms of the company's "Whistle-blowing" policy.

Appropriate action will be taken against the offender whether or not a loss has been suffered. Fraud and corruption of any amount are dismissible offences.

The police may be called in where the evidence justifies such action.

This policy replaces and cancels all other related policies regarding the same subject matter.



Pp CEO MTO FORESTRY (PTY) LTD

This Policy comes in place with effect date January 2016