



DICKINSON
GROUP OF COMPANIES

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DICKINSON GROUP OF COMPANIES

BRIBERY, CORRUPTION & FRAUD POLICY

Policy Statement

The Dickinson Group of Companies, including all Subsidiaries (DGC) is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption and fraud are prevented. DGC has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships. DGC will constantly uphold all laws relating to anti-bribery and corruption.

In South Africa this is governed by The Prevention and Combating of Corruption Activities Act, Act 12 of 2004.

Definitions

- **Bribery** is giving, offering or agreeing to provide benefits to others in order to improperly influence an outcome, to obtain or retain an advantage.
- **Corruption** normally the word that refers to the conduct of a person who accepts a bribe, to be involved in bribery or other dishonest practices. Corruption is the abuse of entrusted power for economic gain.
- **Fraud** is a deliberate act (or failure to act) with the intention of obtaining an unauthorized benefit, either for oneself or for the institution, by using deception or false suggestions or suppression of truth or other unethical means, which are believed and relied upon by others.

General Principles

This policy applies to all employees, managers and owners of DGC, including temporary or contract employees. Employees must ensure that they do not become involved in any way in the payment of bribes. This policy sets out the minimum standards, conventions and recommendations to which all employees of DGC must adhere at all times.

This policy does not prohibit promotional gifts, entertainment and hospitality which are proportionate, transparent, reasonable and for bona fide purposes related to the aims and objectives of the Group. Such promotional items must be declared in writing to the Company CEO.

DGC is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour from employees, managers or customers/clients in any way or form. This policy hereby binds the company to its commitment to regularly discuss and mitigate factors related to any form of bribery, corruption or fraudulent behaviour.

The Hotline to report any illegal or unethical behaviour: fraudhotline@dgrpint.com

Signed: _____

Date: _____

04/10/2022

JC Stapelberg
CEO, Dickinson Group of Companies (South Africa)



Dickinson Group of Companies | Member of Dickinson Group of Companies