



# HOLLARD POLICY



## CORRUPT ACTIVITIES:

Everyone has a duty to prevent and combat corruption.

Any employee who,

- Accepts any benefit whether in cash or otherwise, whether for himself or for another person, or
- Gives any benefit,

in order to act, personally or by influencing another person, including improperly influencing a contract or a tender in a manner that is illegal, dishonest, unauthorized, or biased, or is acquired, in the course of carrying out or performing any of his powers, duties or functions in such a way that amounts to:

- The abuse of a position of authority,
- A breach of trust, or
- The violation of a legal duty or a set of rules or procedures which is:
  - i. Designed to achieve an unjustified result; or
  - ii. Amounts to any other unauthorised or improper inducement to do or not to do anything,

is guilty of the offence of corruption.

### **Extra Territorial Jurisdiction:**

The actions of representatives of South African companies abroad, may attract criminal liability for the Board and management in South Africa. In addition, South African courts have jurisdiction in respect of corrupt activities committed outside the Republic, notwithstanding the fact that such activities may not constitute offences at the place of commission thereof.

### **Reporting Responsibilities:**

Any person in a position of authority who knows or ought reasonably to have known or suspect that another person has committed:

- corruption or
- theft, fraud, extortion, forgery or uttering of a forged document

involving R100 000.00 or more, MUST report this to a public official.

**Not only will an employee be guilty of an offence, Hollard will take the necessary disciplinary action against any employee found to be in breach of this policy.**

**Note:** Refer to the "GRAFT POLICY" as well.