



ANTI-FRAUD AND CORRUPTION POLICY

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ANTI FRAUD AND CORRUPTION POLICY

1. DOCUMENT DETAILS

Document Name	Raubex Group Anti-fraud and Corruption Policy
Policy Reference	Rx Group_1003_Legal&Gov_Policy_AntiFraud
Responsible Person	Group Manager: Governance, Risk and Compliance
Current version approved by	Executive Committee
Date of last review	February 2023
Date of next review	February 2025
Date	February 2023

2. DEFINITIONS

Group	Raubex Group Limited including its subsidiaries
Policy	This policy as well as any appendices attached to it
Protected Disclosures Act	The Protected Disclosure Act 26 of 2000

3. BACKGROUND

3.1 What is this document about?

This document explains the Group's policy on fraud and corruption and sets out the procedures that must be followed to mitigate our risk in this regard.

The Group is committed to the highest standards of ethical behaviour in its business conduct and has adopted this Policy to ensure consistent and effective investigation, reporting and disclosure of fraud and corruption within the Group.

Furthermore, the purpose of this document is to confirm that the Group has adopted a culture of zero tolerance to fraud and corruption in all of its activities.

3.2 Why is this document important?

The policy and procedures set out in this document are important because it will help us to ensure that we do the following:

- Conduct our business with integrity;
- Mitigate our risks with regard to fraud and corruption;
- Provide guidance on how to prevent, report and investigate fraud and corruption in the workplace;
- Promote the eradication of unethical conduct, fraud and corruption;
- Strive to create a culture facilitating the disclosure of information by employees and other parties relating to unethical conduct, fraud and corruption in the workplace in a responsible manner by providing clear guidelines for the disclosure; and
- Encourage and enable employees and external parties to raise concerns within Raubex rather than ignoring a problem or blowing the whistle through inappropriate channels.

3.3 Who must comply with this policy and procedures?

This Policy applies to all attempts and incidents of fraud and corruption impacting or having the potential to impact the Group. All Group directors, officers and employees, must comply with this policy and procedures.

However, the Group has formal grievance procedures, which enable employees to raise grievances relating to their employment. This Policy is intended to cover concerns that fall outside the scope of the above-mentioned grievance procedures.

3.4 Why is it important to comply with this policy and procedures?

A breach of this policy and procedures may result in the following:

- Disciplinary action, which could lead to dismissal;
- Severe harm to our reputation; and
- Possible civil and criminal sanctions.

3.5 Who must be consulted if you have any questions?

You should contact the Group Manager: Governance, Risk and Compliance if you have any questions about this document.

ANTI FRAUD AND CORRUPTION POLICY continued

4. OUR POLICY

We are dedicated to align with best practice and to comply with all relevant legislation that aim to eradicate fraud and corrupt conduct within South Africa and abroad.

To ensure that we effectively mitigate our risk in this regard, we are committed to the following:

- We have a zero-tolerance approach towards fraud and corruption;
- We take a firm stance against tender award irregularities where corruption is suspected and challenge the awarding of tenders through formal legal processes where awards are not consistent with pricing, technical ability and other tender specific criteria;
- We report fraud, corruption and suspicious conduct in this regard;
- We investigate complaints in ensuring accountability;
- We protect whistle-blowers and ensure confidentiality; and
- We promote a culture of compliance with the law and high ethical standards.

Group Manager

Governance, Risk and Compliance

5. UNDERSTANDING OUR POLICY: GUIDELINES

5.1 Policy: We have a zero-tolerance approach to fraud and corruption

a. What is fraud?	<p>Fraud is defined as the unlawful and intentional making of a misrepresentation to the actual or potential prejudice of another.</p> <p>This means that fraud takes place when:</p> <ul style="list-style-type: none"> ▪ One party knowingly lies to another party; ▪ With the intention to mislead that person; and ▪ As a result, the person lied to, suffers – or could suffer, harm or loss.
b. What is corruption?	<p>Corruption can generally be summarised as “giving or offering; receiving or agreeing to receive; obtaining or attempting to obtain any benefit which is not legally due to or by a person who has been charged with a duty or power by virtue of any employment, to do any act or omit to do any act in relation to that power or duty”.</p>

5.2 Policy: We take a firm stance against tender award irregularities where corruption is suspected and challenge the awarding of tenders through formal legal processes where awards are not consistent with pricing, technical ability, and other tender specific criteria

a. What are tender award irregularities?	<p>Tenders (an offer to provide a service or supply goods at a fixed price) must be awarded fairly, must give all applicants an equal chance and must not be tainted by corruption. Any deviations from the prescribed process may be considered an irregularity and may open the tender up to scrutiny. Examples include:</p> <ul style="list-style-type: none"> ▪ Manipulation of tendering procedures; ▪ Procedural irregularities in the procurement process; ▪ Red-flags in the pre-tender process such as inadequate evaluation criteria or procedures; unreasonable pre-qualification requirements; ambiguous, misleading or incomplete contract specifications; contract specifications are too narrow/broad; manipulation of the procurement threshold to avoid prior review ▪ Red-flags in the tender process such as failure to make bidding documents available; short or inadequate notice to bidders; multiple contracts awarded to the same companies; rotation of winning bidders; unreasonably high/low bids; non-transparent bid-opening procedures; disqualifications that are poorly supported; winning bid is very close to the budget or estimate; long unexplained delays in the contract award or negotiations; and ▪ Red-flags in the post-tender stage such as use of questionable agents or subcontractors; delivery of poor quality goods, works or services; questionable contract changes; absent or questionable documentation.
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5.3 Policy: We report fraud, corruption and suspicious conduct in this regard

a. What is considered “suspicious conduct”?	<p>All allegations of fraud and corruption must be properly investigated and if substantiated, must be followed up by the application of all remedies available including disciplinary action in terms of the disciplinary code and prosecution in terms of the law.</p> <p>Any conduct of a person that would give a reasonable person a suspicion that such conduct may be unlawful, fraudulent and/or corrupt. Such a suspicion should be reasonable, not fabricated in any way and not borne from malice or an ulterior motive.</p>
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5.4 Policy: We investigate complaints in ensuring accountability

a. How will investigation occur?	<p>Procedure is set out in section 6.2 below.</p>
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5. UNDERSTANDING OUR POLICY: GUIDELINES CONTINUED

5.5 Policy: We protect whistle-blowers and ensure confidentiality

a. How will confidentiality be protected?

All information relating to reported fraud and corruption will be treated confidentially. The progress of investigations will be handled in a confidential manner and will not be disclosed or discussed with any person other than those who have a legitimate right to such information.

The opinion of the Group Legal Advisor will be sought in assessing this legitimate right in the event of a dispute. This is important in order to avoid harming the reputations of suspected persons who are subsequently found innocent of wrongful conduct.

Furthermore, the Group fraud line is intended to encourage employees and/or other stakeholders to raise concerns relating to fraud and corruption without fear of victimisation. No person will suffer any penalty or retribution for good faith reporting of any suspected or actual incident of fraud or corruption.

Employees or other parties are discouraged from making allegations, which are false and/or made with malicious intent. Disciplinary action will be taken against malicious allegations/reporting.

Additionally, in terms of the Protected Disclosures Act, the “occupational detriment” from which the whistle-blower is protected is:

- Being subjected to any disciplinary action;
- Being dismissed, suspended, demoted, harassed or intimidated;
- Being transferred against his or her will;
- Being refused transfer or promotion
- Being subjected to a term or condition of employment or retirement which is altered, or kept altered, to his or her disadvantage;
- Being refused a reference, or being provided with an adverse reference, from his or her employer;
- Being denied appointment to any employment, profession or office;
- Being subjected to a civil claim arising from their breach of any confidentiality requirement through the disclosure of a criminal act or of a planned or current failure to comply with a law;
- Being threatened with any of the actions mentioned above; or
- Being otherwise adversely affected in respect of his or her employment, profession or office, including employment opportunities and work security

The Protected Disclosures Act further provides additional protection to employees and workers against any civil, criminal or disciplinary proceedings that might otherwise be initiated where the disclosure is prohibited by any other law, oath, contract and practice or agreement requiring confidentiality. This does not protect the employee and/or worker from the consequences of any participation by them in the impropriety.

5.6 Policy: We promote a culture of compliance with the law and high ethical standards

a. How is this done?

Through having policies such as this Policy in place, and requiring that training takes place, we contribute towards awareness of the contents of our policies and the relevant laws.

6. IMPLEMENTING OUR POLICY: PROCEDURES

6.1 Procedure: We report fraud, corruption and suspicious conduct in this regard

- a. Report internally:** It is the responsibility of all employees to immediately report all allegations or incidents of fraud and corruption to their immediate manager or, if the employee has reason to believe that his/her immediate manager is involved, to the next level of management.

Should employees wish to report allegations of fraud or corruption anonymously, they may report it to the Raubex Group Fraud Line numbers or website directly.

Raubex Group Fraud Line posters displaying details of the telephone number and website should be clearly displayed at the business premises throughout the Group. The fraud line details are as follows:

Country	Number	Limitations	Language
Australia	1 800 633 293	Generic toll-free number. Toll-free access from fixed line, accessible from most mobile networks – mobile rates may apply.	English 24/7
Botswana	71119602 (Mascom) 0800 600 644 (BTC) 1144 (Orange)	Generic toll-free numbers. Each number is only toll-free and accessible from the respective corresponding network.	English 24/7 SeTswana during SA business hours Mondays to Fridays 08:00 – 17:00 CAT
Namibia	0800 015 005	Customised toll-free number accessible from Namibia Telecoms.	English 24/7 Oshiwambo and Otjiherero during Namibian business hours Mondays to Fridays 08:00 – 17:00 CAT with voice mail after-hours Afrikaans during SA business hours Mondays to Fridays 08:00 – 17:00 CAT
South Africa	0800 205 314	Customized toll-free number, toll free access from all networks.	English 24/7 All other 10 official languages during SA business hours Mondays to Fridays 08:00 – 17:00 CAT
Zimbabwe	08644041104 +27 31 571 8993	Generic local Zimbabwe number. Accessible from most networks at normal call rates within Zimbabwe. Generic local South Africa number. Accessible from most networks at international call rates to South Africa.	English 24/7

ANTI FRAUD AND CORRUPTION POLICY continued

6. IMPLEMENTING OUR POLICY: PROCEDURES CONTINUED

6.1 Procedure: We report fraud, corruption and suspicious conduct in this regard continued

	<p>Website: www.tip-offs.com Email: raubex@tip-offs.com</p> <p>It is the responsibility of the relevant managers to ensure that all incidents and allegations of fraud and corruption reported to them are reported immediately to the Group Financial Director and Group Manager: Governance, Risk and Compliance. The following contact details are relevant:</p> <table border="0"><tr><td>Financial Director</td><td>Group Manager: GRC</td></tr><tr><td>Tel: 051 406 2000</td><td>Tel: 051 406 2000</td></tr><tr><td>Email: sam.o@raubex.com</td><td>Email: rabi.ma@raubex.com</td></tr></table>	Financial Director	Group Manager: GRC	Tel: 051 406 2000	Tel: 051 406 2000	Email: sam.o@raubex.com	Email: rabi.ma@raubex.com
Financial Director	Group Manager: GRC						
Tel: 051 406 2000	Tel: 051 406 2000						
Email: sam.o@raubex.com	Email: rabi.ma@raubex.com						
b. What not to do:	<p>An employee who suspects dishonest or fraudulent activity should not attempt to:</p> <ul style="list-style-type: none">▪ Personally conduct investigations or interviews/interrogations related to any suspected fraudulent act; or▪ Contact the suspected individual in effort to determine facts or demand restitution.						
c. Remember that:	<p>All information received will be treated confidentially to the extent possible, while allowing a full investigation to be conducted into the suspected fraud or corruption allegation. The Group reserves the right to pass on any information to the proper law enforcement agency in order that such entity may determine whether criminal charges are warranted.</p> <p>Managers should discourage employees and workers from making allegations, which are false and uttered with malicious intent. In instances where such allegations are proven untrue and malicious, the employee who made them shall be subjected to firm disciplinary action. It is an offence to provide false information intentionally, and where this results in harm, a conviction may result in a fine, imprisonment for up to two years, or both a fine and imprisonment.</p>						

6.2 Procedure: We investigate complaints in ensuring accountability

a. Investigation by Group:	<p>The action taken by the Group will depend on the nature of the concern, where it may be investigated internally (management, internal audit or legal services) and/or referred to South African Police Service ("SAPS") or another relevant law enforcement agency.</p> <p>Upon receiving a complaint or tip off from a whistle-blower, we will:</p> <ul style="list-style-type: none">▪ Enter the complaint in the whistle-blowing register;▪ Initiate a preliminary enquiry/review on the allegations; and▪ Should the results of the preliminary review indicate a need for further investigation, the matter will be referred to the relevant subsidiary or department, internal auditors or to any other relevant party. <p>The Group Manager: Governance, Risk and Compliance, in conjunction with the relevant senior member of management, have the primary responsibility to co-ordinate the investigation of all suspected fraudulent or corrupt acts reported under this Policy.</p> <p>If the investigation substantiates that significant fraudulent or corrupt activities have occurred, the Group Manager: Governance, Risk and Compliance, has the responsibility to notify the Audit Committee of the Group on a timely basis of such activities.</p> <p>Relevant senior divisional management are also responsible for including details of any such allegations of fraud or corruption in their monthly reporting to the Executive Committee of the Group.</p>
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ANTI FRAUD AND CORRUPTION POLICY continued

6. IMPLEMENTING OUR POLICY: PROCEDURES CONTINUED

6.2 Procedure: We investigate complaints in ensuring accountability CONTINUED

Any fraud or corruption committed by an employee of the Group will be pursued by thorough investigation and to the full extent of the law, including:

- Taking disciplinary action within a reasonable period of time after the incident; and/or
- Instituting civil action; and/or
- Initiating criminal prosecution by reporting the matter to the SAPS or any other relevant law enforcement agency; and/or
- Any other appropriate and legal remedy available.

The judgment of senior management will be required to ensure that the economic and practical realities of taking the steps required above are adequately considered and applied appropriately in the particular circumstances.

Managers are also required to ensure that losses or damages suffered by the Group as a result of all reported acts committed or omitted by an employee or any other person are recovered from such an employee or other person if he or she is found to be liable.

Great care must be taken in the investigation of suspected improprieties or wrongdoings so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

7. VERSION CONTROL

Version	Status	Date	Author	Change description
0.1	Version before major review	22 May 2018	Governance, Risk and Compliance	Revised Policy
0.2	Final policy	February 2021	Governance, Risk and Compliance	Policy revised and approved
0.3	Final Policy	February 2022	Governance, Risk and Compliance	Section 6.1 updated for new tip off contact details
0.3	Revised policy	January 2023	Governance, Risk and Compliance	Policy revised and approved

8. CONTACT

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