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Subject:	Gifts, Entertainment and Anti-Bribery Policy (HRP0009)
Compiled by:	CTL Group (Pty) Ltd
Authorised by:	Directors of E.P.X Courier Services
Implemented:	1 September 2021
Amended dates:	



GIFTS, ENTERTAINMENT & ANTI-BRIBERY POLICY

(HRP0009)

1. POLICY STATEMENT:

- 1.1. Giving and accepting gifts, benefits and entertainment is common practice in business and the Company recognises that such activity enhances, develops and improves business relationships.
- 1.2. Part of our core values is to uphold the highest ethical standards of honesty and integrity, the Company must therefore ensure that gifts, benefits and entertainment offered or received by employees are of a value and frequency that would not give rise to an actual or perceived conflict of interest.
- 1.3. In addition, the Company does not tolerate bribery or corruption. A zero-tolerance approach will be applied for in this regard. It should further be noted that bribery and corruption are punishable by imprisonment and a fine. If our Company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and

face serious damage to our unblemished reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

- 1.4. This policy does not cover all situations that may arise. If any employee is in doubt as to whether giving or accepting a gift, benefit or entertainment is appropriate, the employee(s) is required to consult management for advice/decision.

2. APPLICATION OF THIS POLICY:

- 2.1. This policy applies to all employees employed at the Company, irrespective of type of contract.
- 2.2. This policy also applies to Trustees, board, and or Committee members at any level.
- 2.3. Any arrangement our Company makes with a third party is subject to clear contractual terms, including specific provisions that require a third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

3. SCOPE:

- 3.1. Gifts, benefits, entertainment and bribery can take many forms, monetary or non-monetary and could include without limitation, the following:
 - Tangible goods (food, liquor, mobile phones etc.)
 - Lunches/dinners
 - Tickets to cultural or sporting events
 - All expenses paid conferences
 - Flight tickets, travel, pleasure trips, accommodation, holidays
 - Services
 - Secret commissions
 - Donations or contributions
 - Sponsorships
 - Special privileges

3.2. It is critical that the Company remains independent and objective. The offer, provision or acceptance of gifts and/ or hospitality requires the exercise of the utmost care and judgement.

3.3. Bribery is defined as an offering an advantage intending to persuade or reward a party to perform a function or activity improperly. Such an advantage may be either financial or non-financial.

Some examples of a bribe are:

- Direct/indirect promise, offering or authorisation of anything of value.
- Offer or receipt of any kickback, loan, fee, reward, or other advantage.
- Giving of aid, donations or voting designed to exert improper influence.

4. PROCEDURES FOR ACCEPTANCE OF GIFTS, BENEFITS OR ENTERTAINMENT:

4.1. The head of each business unit or the Directors of the Company, must approve all gifts, benefits and entertainment where the monetary value exceeds a rand value of R500.00. In case of no definite value, that the final decision be made by an available Director.

4.2. In all instances, any form of gift must be recorded onto a gift register attached to this policy.

4.3. Branch Managers are required to update and ensure compliance daily without fail to ensure compliance. Furthermore, to report back to management on a monthly basis and sending monthly registers to Chantell Nell-Marais at chantelln@epx.co.za for record keeping purposes.

4.4. The Company will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. The assigned manager on behalf of senior management will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to directorial review.

5. BREACH OF POLICY:

5.1. Any form of breach will be dealt with in accordance with the implemented disciplinary code and procedure.

6. UNTOWARD CONDUCT OR SUSPICIOUS ACTIVITY:

- 6.1. If you suspect that there is an instance of bribery or corrupt activities occurring, you are encouraged to raise your concerns immediately with your direct manager or to the Human Resources Department. This will be handled with sensitivity and caution.
- 6.2. If you have been targeted in any shape or form to accept a bribe or to withhold information, you have a duty to report this to your direct manager or to the Human Resource Department without delay.
- 6.3. The Company within reason will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because of reporting such which could lead to serious consequences for the Company.

7. IN CLOSING:

- 7.1. Any need for improvement will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to Human Resources or with Chantell Nell-Marais at chantelln@epx.co.za.
- 7.2. This policy does not form part of an employee's contract of employment and the Company may amend it from time to time to improve its effectiveness at combating bribery, corruption or any form of irregularity within employment referring to gifts and entertainment.

GIFTS, ENTERTAINMENT AND ANTI-BRIBERY POLICY
FORM (NUMBER)

EMPLOYEE NAME & SURNAME:	
CLOCK NUMBER:	
JOB TITLE:	
BRANCH:	
DATE: (of the form)	
DATE: (gift received)	
FROM CLIENT/COMPANY:	

**** Please attach any email or supporting documentation of the gift/entertainment received from client to this document.**

TYPE OF GIFT/ENTERTAINMENT:

SIGNATURE: EMPLOYEE

SIGNATURE: MANAGEMENT