



**POLICY**  
**ANTI-CORRUPTION**





## **ANTI-CORRUPTION POLICY**

### INTRODUCTION

This policy covers:

1. *Bribery.*
2. *Fraud & extortion.*
3. *Facilitation Payments.*
4. *Gifts, entertainment and expenses.*
5. *Charitable contributions & sponsorships.*
6. *Use of company assets.*
7. *Conflict of interest* 8. *Joint Ventures & mergers.*

### **PURPOSE**

The purpose of this policy is to reinforce Zion Precious Metals (Pty) Ltd commitment to anti-corruption compliance. Zion Precious Metals (Pty) Ltd will provide the foundation for the development of procedures to manage corruption and risk. Zion Precious Metals (Pty) Ltd is also committed to **operating its business in compliance with the applicable laws in which it operates.**

### **SCOPE**

This policy applies to all of the company's activities to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, casual workers or any other person associated with the company.

### **POLICY STATEMENT**

Corruption is the abuse of entrusted power. Zion Precious Metals (Pty) Ltd takes a zero-tolerance approach to corruption and is committed to carrying out business fairly, honestly and openly, and without improper influence.

#### 1. Bribes

Employees must not engage in any form of bribery, either directly or through any third party. We require that all staff, including those permanently employed temporary staff and contractors act honestly and with Integrity at all times and to safeguard the company's resources for which they are responsible. It is unacceptable to:

- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage from you.
- Retaliate against or threaten a person who has refused to commit a bribery offence.
- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.

#### 2. Fraud & Extortion

Fraud and Extortion are criminal offences. Zion Precious Metals (Pty) Ltd prohibits the direct or indirect demand for or acceptance of any advantage, through deception or otherwise.



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### **3. Facilitation Payments**

A facilitation payment is payment of a bribe to a government or public official to secure or expedite the performance of a routine action to which the payer is entitled. Zion Precious Metals (Pty) Ltd recognizes that there may be circumstances in which an official threatens or compromises the personal safety and security of a staff member concerned (or another) in order to procure payment, in such situations the payment must be reported immediately as Zion Precious Metals (Pty) Ltd prohibits any form of Facilitation Payments.

### **4. Gifts, Entertainment & Expenses**

Zion Precious Metals (Pty) Ltd recognizes that fostering good relationships with business partners is important to its continued success. The provision and receipt of modest gifts and entertainment, and the incurring of modest expenses, are acceptable in principle provided that they are reasonable and made transparently. However, the receipt of any gift or entertainment, or the incurring of any expenses, is not permitted where it is offered or received in exchange for a business benefit, creates any sense of obligation or is otherwise illegal.

Any activity that could be perceived as having any of the above effects is prohibited. All gifts or hospitality must be approved in writing by the employee's manager and placed on staff file. Employees may not accept any gift or hospitality from any individual or organization that we come into contact with, and includes actual and potential clients, suppliers, distributors, business contacts, unless approved in writing by the employee's managers and placed on staff file.

### **5. Charitable Contributions and Sponsorships**

Zion Precious Metals (Pty) Ltd makes charitable contributions and offers sponsorships for the purposes of socio - economic development or linked to cultural or sporting activities and not for improper business purposes. Charitable donations and sponsorships must not be perceived as being given for improper purposes. When a charitable contribution or sponsorship is proposed, it must be transparent, documented, made in accordance with applicable law and assessed for compliance with this policy and any related procedures.

### **6. Use of Company Assets**

Employees have a responsibility to protect Zion Precious Metals (Pty) Ltd assets from theft, loss, abuse, unauthorized use or disposal. Employees must use company assets only for purposes related to conducting Zion Precious Metals (Pty) Ltd business and may use company assets for other uses only when authorized.

### **7. Conflict of Interest**

Employees must avoid conflicts of interest and are expected to perform their duties conscientiously, honestly and in accordance with the best interest of Zion Precious Metals (Pty) Ltd. Employees must not abuse their position, misuse confidential knowledge for personal or third party gain, or have any direct involvement in any business interest which diverts their attention from, or is in conflict with, Zion Precious Metals (Pty) Ltd interest, or which in anyway compromises their own independence.

### **8. Mergers & Joint Ventures**

Zion Precious Metals (Pty) Ltd is committed to undertaking appropriate and reasonable due diligence on the reputation and integrity of any business in which it invests.



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### **EMPLOYEES RESPONSIBILITIES**

Employees must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Zion Precious Metals (Pty) Ltd . All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. The employee must notify his/her line Manager as soon as possible if he or she believes or suspects that a conflict with or breach of this policy has occurred or may occur in the future. Any employee who breaches this policy will face disciplinary action.

### **RAISING CONCERN (“WHISTLE BLOWING”)**

Zion Precious Metals (Pty) Ltd is committed to ensuring that all of us have a safe, reliable and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concern.

There are multiple managers to help you raise concern. Concerns can be anonymous. In the event that an incident of bribery, corruption or wrongdoing is reported, we will act as soon as possible to evaluate the situation.

We are committed to ensuring that nobody suffers detrimental treatment through refusing to take part in bribery or corruption.

### **MONITOR AND REVIEW**

Compliance Officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.

It is the employee's responsibility to contact management should he / she have any queries. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to line Management.



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