



OVERBERG RENOSTERVELD CONSERVATION TRUST ("ORCT")

POLICY NAME: Bribery, Corruption & Fraud Policy

POLICY & VERSION NUMBER: 1 Version 1

APPROVED BY BOARD: DATE: 15th September 2023

EFFECTIVE FROM: DATE: 1 October 2023

1. **PURPOSE**

The ORCT 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. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with farmers, partners and employees.

2. **POLICY OBJECTIVES**

- 2.1 The ORCT is committed to fostering a culture of honesty and integrity, underpinned by seven principles: selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- 2.2 Trustees, staff contractors, representatives and volunteers are expected to lead by example in adhering to the ORCT's policies, procedures and practices. Equally, supporters, partners and external organisations (such as suppliers and contractors) are expected to act with

integrity and without intent to commit bribery or fraud in any dealings they may have with the ORCT.

- 2.3 The ORCT will ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest.
- 2.4 The ORCT will not tolerate any behaviour that falls short of these principles.

3. **REGULATORY FRAMEWORK**

The Prevention and Combating of Corrupt Activities Act 12 of 2004 (PACCA). PACCA provides for the strengthening of measures to prevent and combat corruption and corrupt activities in both the public and private sectors of South African society.

4. **ROLES AND RESPONSIBILITIES**

N/A

5. **PROCEDURE**

All employees of the ORCT must adhere to the company ethos of bribery and corruption. No employee, manager, trustee, contractor, volunteer or representative will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- 5.1 Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
- 5.2 Attempt to mislead or induce any person to do something illegal or which goes against the Trust's policy.
- 5.3 Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- 5.4 Violate any rules by shifting blame or responsibility onto another employee/ person.
- 5.5 Fraudulent practices against the Trust's ethos or legislation.

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

6. **MONITOR AND REVIEW**

The policy will be reviewed every 3 years on the anniversary of first approval.