



1. Introduction

ATBRO Systems CC are committed to achieving and sustaining the highest levels of standards and ethical business practices.

ATBRO Systems employs a zero-tolerance policy on corruption, bribery and theft in its dealings with any customers, suppliers, management or staff.

Our code of conduct and ethics further substantiates these standards.

Our Anti-Corruption and Anti-Bribery policy brings into focus elements which are already included in the Codes of Good Business Practices.

The policy is aimed at assisting ATBRO Systems' employees to identify and avoid any situation which could be deemed a violation as specified in the anti-bribery and anti-corruption laws of South Africa,

It is imperative that all ATBRO Systems employees are familiar with and have a full understanding of this policy and rules and regulation enforced by the company.

Bribery is illegal and could result in dismissal and imprisonment.

Bribery will affect the company's image and would negatively affect the high standards the company has maintained over the previous 15 years.

It is a direct contravention to our values, morals and ethics.

It is mandatory for all employees and management to adhere to this policy and subsequent rules and regulations.

If any ATBRO Systems' employee has any knowledge of another person employed by the company being involved in any act of bribery it is their responsibility to report the matter immediately to Tarryn van der Merwe via telephone or email.

She will then determine the required investigative procedure and report directly to Andrew Brown with all documentation pertaining to the allegations and findings of the investigation.

ATBRO Systems guarantees that no repercussions or retaliation will be made against any employee who informs management of a discretion as it is in ATBRO Systems best interest to do such.

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2. Adopted Policy

ATBRO Systems will only conduct business activities that fall completely within the scope of the law. ATBRO Systems will not pay or offer any service or goods to any government official to influence contracts or purchase orders in favour of ATBRO Systems. Declarations will be signed by management substantiating this on commencement of any and all works approved legally.

ATBRO Systems will not appoint or implore a middle man or third party to offer such services, payment or goods to do so.

Any behaviour which contradicts the statements detailed above will be construed as bribery and will be dealt with accordingly by internal repercussions and with the full force of the law. Such dealings are considered to be unlawful and in direct contravention to the Codes of Good Business Practices.

Failure to comply with this policy is considered a serious violation and will be dealt with by means of disciplinary action, termination of employment as well as criminal and/or civil charges.

This policy is enforced and designed to determine the minimum acceptable standards that all employees must act by.

Bribery and corruption within ATBRO Systems does not only apply to government officials but also to any customer who employs ATBRO Systems services.

It is unacceptable in any form to receive works from customers that have received gifts, goods or financial benefits to secure the works.

All employees shall be aware of the repercussions of such actions.

All employees will ensure that they at all times conduct themselves with pride and without prejudice and maintain the company's high standard of operating procedures and ethical code.

In addition to employees offering gifts, goods, service or financial benefits to customers it must also be understood that ANY employee who agrees to appoint any supplier by receiving any of the above listed offerings will also be construed as bribery.

No ATBRO Systems employee shall receive gifts or financial aid from any supplier in an attempt to sway the company's decision as to whether to appoint that specific supplier.

Should a case be made that any of the above has occurred a full internal investigation will be implemented and the determined outcome could result in either disciplinary action, suspension or termination of employment.

Civil or criminal charges may be taken by the company against the guilty employee.

It is expected that all gifts received from suppliers by any employee must be declared to management to ascertain the intention thereof.

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3. Due Diligence

Before ATBRO Systems enters into any contract with a supplier, customer or contractor, due diligence must be performed to conduct a reasonable investigation into the party's background, reputation and capabilities.

This investigation should be well documented.

4. Discipline

ATBRO Systems hereby reserves the right to enforce any legal action required against any employee who is in contravention of this policy.

ATBRO Systems hereby reserves the right to not enter into any contract where bribery or corruption has been deemed to have taken place.

ATBRO Systems has an obligation to maintain the highest standards of Anti-Bribery and Anti-Corruption policies and codes, both internally as well as the codes which are required by law.

It will be required that all employees receive a copy of this policy and sign as confirmation of receipt hereof.

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