



**THE SPAR GROUP LIMITED**

Reg. No. 1967/001572/06

("the Company" or "SPAR")

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## **ANTI-BRIBERY AND CORRUPTION POLICY**

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### **INTRODUCTION**

SPAR is anti bribery and corruption and is committed to prevailing codes of best practice and supports the Organisation for Economic Co-operation and Development (OECD) Anti-Bribery Convention, to which South Africa is a signatory.

**Bribery** is a criminal offence in many countries and corrupt acts expose SPAR, its board of directors, officers and employees to the risk of prosecution, fines and imprisonment, as well as endangering the reputation of the Company. Bribes are means of influencing a person allowing certain favours. These actions are corrupt, unethical and in violation of different laws across the world such as the Prevention and Combatting of Corrupt Activities Act, 12 of 2004, the UK Bribery Act and the US Foreign Corrupt Practices Act.

**Corruption** is an abuse of power in order to secure personal gain. It involves more than just accepting bribes. It includes a failure to report irregular activities in an organisation, ignoring regulatory procedures abusing power in any other manner.

### **PURPOSE**

This policy expresses SPAR stance against all forms of bribery, corruption, unethical or unlawful conduct, or any other business activities that violate the values or spirit of human rights and good governance.

### **SCOPE**

This policy applies to all directors of the Company, officers and employees of the Company.

This policy is to be read in conjunction with SPAR's Code of Ethics, Fraud Prevention Policy and Whistleblowing Policy.

It is the responsibility of all directors, officers and employees of the Company to comply with this policy and failure to do so could amount to gross misconduct and a material breach of the contract of employment. Furthermore, SPAR could be held criminally liable for failing to prevent bribes.

### **POLICY STATEMENT**

SPAR is committed to maintaining the highest standards of honesty, integrity and ethical conduct and this and other SPAR policies upholds its commitment to the fight against bribery and corruption in both private and public-sector transactions.

The SPAR Code of Ethics is communicated to all employees and states that: “no secret profits, bribes or any other corrupt benefits shall be accepted from or offered to any person with whom the Company does business.”

No director, officer or employee of SPAR shall directly or indirectly:

- take or receive something with the intention of influencing the recipient in some way favourable to the party providing the bribe;
- abuse their power for personal gain;
- provide any type of bribe, regardless of the amount, to a Government Official and/or Foreign Public Official; and
- give, offer or promise any entertainment, gift or other advantage to a Government Official and/or Foreign Public Official.

### **REPORTING OF INCIDENTS**

If any person becomes aware of a circumstance or action that violates or appears to violate this policy, they are encouraged to contact their supervisor or manager or alternatively contact the Whistleblowing Hotline via Deloitte Tip-offs Anonymous:

Free call: 0800 864 616  
Email: [spar@tip-offs.com](mailto:spar@tip-offs.com)  
Web: [www.tip-offs.com](http://www.tip-offs.com)

Whistleblowing is a powerful tool for all stakeholders and employees to responsibility and safely report corrupt, unlawful, unethical or irregular conduct that they become aware of. Employees must take a stand against bribery and corruption, and not fear that they will receive punishment if they do. SPAR is committed to ensuring that no employee suffers any Occupational Determent as a result of reporting a genuine concern in good faith.

### **ADMINISTRATION OF THIS POLICY**

The custodian of this policy is the Group Secretariat Department who will be responsible for the administration, revision, interpretation and application of this policy, which will be reviewed triennially or as and when required.

Any alternation of this policy is subject to approval by the Board/Social and Ethics Committee.

This policy was approved by the Board on **29 May 2018** and becomes effective immediately on approval.