

V4 –31 Aug 2016

GIFT POLICY

Approved By:



T Kodde
Company Secretary
(Duly authorised by Exco)

Date: 31 August 2016

Next revision: 31 July 2017

Approved By:



H Austen
Head of Legal: Attacq Ltd

Date: 31 August 2016

ATTACQ ANTI-CORRUPTION MISSION STATEMENT:

At the Attacq group of companies and in alignment with international laws, we conduct business in utmost integrity and do not condone any form of corruption including, but not limited to, we do not promise, give, offer, authorize directly or indirectly a bribe or anything of value to anyone-including any of its service providers or any government official/employee with the goal of improperly influencing any decision to obtain or retain business or to secure any advantage to Attacq or any of its employees.

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1. **DEFINITIONS**

1.1 "Attacq" means Attacq Limited (Registration Number: 1997/000543/06) and its direct and indirect subsidiaries. For the purpose of this definition, subsidiary means a company controlled by a holding company. At the date of this Policy, this includes Attacq Waterfall Investment Company Proprietary Limited, Attacq Retail Fund Proprietary Limited, Attacq Management



Services Proprietary Limited, Attacq Retail Services Proprietary Limited, Lynnwood Bridge Office Park Proprietary Limited, Brooklyn Bridge Office Park Proprietary Limited, the Property Associations at Lynnwood Bridge and Waterfall;

- 1.2 **"Attacq Employees"** means any employee of Attacq whether in a permanent or temporary position including executive directors;
- 1.3 **"Gift"** includes but is not limited to pens, t-shirts, mugs, calendars, keychains, food and beverages, portfolios, flowers, jewelry, product discounts, entertainment (such as concerts, sporting events, spa days, weekend away) whether to the Attacq Employee directly or friend or family member of the Attacq Employee;
- 1.4 **"this Policy"** means the Gift encapsulated herein and as amended from time to time.

2. INTRODUCTION

- 2.1 Attacq Employees' attention is drawn to the Attacq Anti-corruption policy and Whistleblowing Policy which must be read in conjunction with this Gift Policy.
- 2.2 Attacq Employees –
 - 2.2.1 must at all times demonstrate the highest standard of ethics and conduct in our relationship to joint venture partners, funders, vendors, suppliers, service providers, tenants and other stakeholders (whether actual or potential) ("**Attacq Stakeholders**");
 - 2.2.2 must practise equal treatment, unbiased professionalism, and non-discriminatory actions in relation to all Attacq Stakeholders with whom they come into contact;
 - 2.2.3 must avoid a conflict of interest with Attacq between their direct or indirect personal interests and the best interest of Attacq, or could create a sense of indebtedness or undue advantage when engaging in business dealings for or on behalf of Attacq.

3. SCOPE OF THE POLICY

To assist Attacq Employees in living the value of utmost integrity in our dealings with Attacq Stakeholders and to assist the Employees in the requirements set out in 2.2 above, Attacq has implemented this Policy

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The Policy is applicable to Attacq Employees in all dealings and transactions in all countries where Attacq operates. Attacq Employees are expected to read, understand and abide by this policy.

4. RESPONSIBILITY OF ATTACQ EMPLOYEES UPON RECEIPT OF A GIFT

4.1 Attacq Employees must within two business days of receiving the gift –

4.1.1 DECLARE all gifts with a market value of R350 or more (but below R1,000), or gifts from a single Attacq Stakeholder with a cumulative market value of R700 (but below R2,000) in the prescribed gift declaration register. DO THIS BY SENDING AN EMAIL TO YOUR LINE MANAGER AS WELL AS THE EXECUTIVE ASSISTANT OF THE ATTACQ CEO (“CEO EA”) disclosing -

4.1.1.1 the nature and value of the gift; and

4.1.1.2 the name of the company or person which has provided the gift;

4.1.2 OBTAIN WRITTEN CONSENT from your relevant Exco member prior to accepting a gift with a value of R1,000 or more or gifts from a single Attacq Stakeholder with a cumulative value of R2,000 or more over a six month period. DO THIS BY SENDING AN EMAIL TO THE RELEVANT EXCO MEMBER AS WELL AS THE CEO EA disclosing

4.1.2.1 the nature and value of the gift; and

4.1.2.2 the name of the company or person which has provided the gift;

AND by attaching the email from the Exco member granting permission to receive the gift.

4.1.3 OBTAIN WRITTEN CONSENT from your relevant Exco member prior to accepting a day or weekend away as a gift. DO THIS BY SENDING AN EMAIL TO THE RELEVANT EXCO MEMBER AS WELL AS THE CEO EA (copying HEAD OF HR) disclosing

4.1.3.1 the nature and value of the gift; and

4.1.3.2 the name of the company or person which has provided the gift;

AND by attaching the email from the Exco member granting permission to receive the day or weekend away. PLEASE NOTE that unless the employee's Exco member agrees otherwise, an employee (other than Exco members) will only be entitled to two paid working days' leave to attend days away from the office. Exco members are entitled to five paid working days' leave to attend days aware from the office.

4.2 Executive directors are required to disclose all gifts received via an email to the CEO CA as well as the Company Secretary.

Handwritten initials/signature

- 4.3** When receiving a gift which will give rise to a breach of the Policy if accepted by an Attacq Employee, the Attacq Employee must inform the relevant Attacq Stakeholder in a professional manner of the Policy and the gift must be returned.
- 4.4** Even if the gift is below the monetary value set out above, if the Attacq Employee suspects that the Attacq Stakeholder gave the gift to the Attacq Employee to get an improper or undue benefit over another stakeholder which might be interpreted as Corruption in the wide sense postulated in the Anti-corruption Policy, the Attacq Employee must immediately inform his/her Exco member of his/her suspicions to ensure that appropriate action is taken.

5. WHISTLEBLOWING

Attacq Employees can anonymously report breaches of this Policy through the Whistleblowing Hotline,

Tel: 0800 111 609

Email: attacq@whistleblowing.co.za.

Attacq Employees' attention is drawn to the Whistleblowing Policy as amended from time to time.

31 August 2016

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