

# Centrafin and our Customers have to adhere to Anti-Bribery Laws

## No-one in the supply chain is allowed to offer, pay, request or receive bribes

Our vendors require that anyone in the supply chain, including distributors, resellers and third parties, adhere to the following legislation (as a minimum):

- United States Foreign Corruption Practices Act (FCPA);
- United Kingdom Anti-bribery Act;
- South African Prevention and Combating of Corrupt Activities Act, 2003.

### Why?

- Anti-corruption laws govern requirements for companies around bribery and corruption;
- Vendors are compelled by law to comply with this legislation; and
- Vendors are obliged to ensure that everybody in the supply chain including distributors, resellers and service providers of their products adhere to these laws, **irrespective of the territory in which their products are sold or services offered.**

### What is it?

- Anti-corruption laws prohibit bribery by anyone in the supply chain in order to solicit a sale;
- Bribery and payments include cash, travel expenses, entertainment, additional side agreements, commissions or even sponsorships or contributions to organisations etc.;
- You cannot ignore what is done by third parties in the supply chain as **you are also liable**;
- "I did not know" is not an excuse;
- **Reasonable** gifts or entertainment may be offered; and
- Laws prohibit distributors, resellers and third parties or their agents to sell goods to countries who feature on "banned countries lists."

### What can happen?

#### Corporate suicide:

- Loss of distributor agreement;
- Imprisonment;
- Reputation damage; and
- Hefty penalties or fines imposed on all parties in the supply chain.

### Next steps:

- **Please familiarise yourself with the requirements of anti-corruption legislation;** Vendors' websites carry information or even training programmes;
- **Know the difference between a gift and a bribe. Declare gifts both given and received valued above R500 or equivalent.**
- Understand the parties that you are involved with;
- Do proper due diligence on third parties before dealing with them;
- Be aware of possible "red flags" (corruption indicators) and trust your instincts – investigate or report those; and
- You are required to ensure that your customers/resellers and agents are familiar with the requirements covering anti-corruption, and are properly trained on the topic.

### Blow the Whistle on bribery, corruption, fraud, and theft!

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