



Triangle Organisation (Pty) Ltd t/a

TRIANGLE DISTRIBUTION

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KUILSRIVER
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Tel 021 903 0191
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PO Box 1262
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Reg No: 2017/425638/07

VAT No: 4310180567

Triangle Organisation (Pty) Ltd.01/07/2021
Anti-corruption policy 001/21

Anti-Corruption Compliance

Policy Statement

Triangle Initiative (Pty) Ltd. its business units, and majority-owned or controlled subsidiaries operates lawfully and ethically wherever it does business around the world. Triangle Initiative Personnel and Third Parties (both defined below), wherever located, are prohibited from engaging in any form of corruption related in any way to or involving Triangle Initiative business.

Purpose and Scope

This Anti-Corruption Compliance Policy demonstrates Triangle Initiative's commitment to lawful and ethical business practices and compliance with laws concerning corruption, political activities, conflict of interest and global trade. It provides the foundation for procedures designed to assist Triangle Initiative's Personnel in implementing this commitment and guide their decision-making and conduct.

Triangle Initiative's Personnel and Third Parties are required to follow this Anti-Corruption Compliance Policy and its corresponding procedures. Failure to do so, including providing any false or misleading information required for a diligence review, can result in:

- contract termination,
- adverse employment action, up to and including reduction in compensation or termination of employment, and
- individual criminal sanctions and civil penalties.

Definitions

"Triangle Initiative Personnel" means directors, officers and employees of Triangle Initiative.

"Bribes or Illegal Payments" means anything of value (including but not limited to money, a job opportunity, kick-back, financial incentive, gift card, a scholarship for a dependent child, or a loan with below market interest rate) that is directly or indirectly offered, given or accepted to improperly or unlawfully:

(i) induce or influence any act or decision of a person as part of his or her official duties or responsibilities,



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(ii) obtain or retain business, or

(iii) obtain any other kind of inappropriate advantage for or on behalf of Triangle Initiative or for personal gain.

“Consultant” means a person or entity working on behalf of or for Triangle Initiative to mediate, facilitate, or improve a relationship between Triangle Initiative and non-Triangle Initiative Personnel or entities.

Anti-Corruption Compliance

“Government Officials” means any officer, employee or person acting in an official capacity on behalf of a government or political party including but not limited to

- a candidate for government political office;
- an officer or employee of a government, government-owned (50% or more) or controlled company or institution such as a university;
- uncompensated honorary officials who have actual influence in the award of business;
- certain members of royal families;
- any entity or person hired to review or accept bids for a government agency;
- spouses and other immediate family members of any of the persons listed above; and
- former government employees who are subject to “revolving door” or similar conflict of interest laws.

“Third Party” means a Third Party, wherever located, which supports Triangle Initiative’s business operations

“Third Parties” means any person (excluding Triangle Initiative’s Personnel) or entity working on behalf of or for Triangle Initiative.

- “Third Parties” includes but is not limited to agents, Consultants, representatives, distributors, joint ventures, joint venture partners, temporary agency personnel, contract-basis personnel, commercial or sales agents, customs brokers, shipping agents, immigration expeditors, and professional service providers such as an accountant, lawyer or auditor.

Bribes and Illegal Payments



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Triangle Initiative's Personnel and Third Parties are prohibited from engaging in any activity involving Bribes or Illegal Payments. Small unofficial payments to obtain or expedite routine governmental action ("facilitation" or "grease" payments) may not be paid.

Lawful "expediting fees," such as a fee paid directly to a government department to obtain a passport or visa more quickly, may be paid, but the nature and purpose of such fees must be fully and accurately recorded in Triangle Initiative's books and accounting records.

Business Gifts, Meals and Entertainment

Triangle Initiative Personnel and Third Parties must not offer, give or accept business gifts, meals, entertainment, travel or other benefits or expenses. Unlawfully influence the business decisions made for or on behalf of Triangle Initiative or give the appearance of impropriety.

- For example, a business gift, meal, entertainment, travel or other benefit or expense may be improper if it would create an expectation that the recipient will have to do something in exchange.
- Particular sensitivity must be observed in considering any business gifts, meals, entertainment, travel or other benefits, expenses or hospitality to or from any party currently engaged in negotiations with Triangle Initiative.

Triangle Initiative Personnel and Third Parties may not:

- offer, give or accept any business gift, meal, entertainment, travel or other benefit or expense when it is prohibited by law, regulation or policies applicable to the recipient or intended recipient.
- provide anything of value, directly or indirectly, to Government Officials without prior written approval from the Law Department.

Triangle Initiative Personnel acceptance and giving of business gifts, meals and entertainment shall be in accordance with the Business Gifts, Meals and Entertainment Policy referenced below.

Travel

Triangle Initiative may pay travel and related expenses incurred by Government Officials or Third Parties traveling to and from a Triangle Initiative location or event as long as the travel expenses are:



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- reasonable and bona fide;
 - directly related to the promotion, demonstration or explanation of Triangle Initiative's products or services or the execution or performance of a contract;
 - not intended to improperly or unlawfully influence the recipient; and
 - provided in accordance with requirements of applicable company policies and procedures, including having received prior written approval of any such arrangement from the Law Department.

Political and Charitable Contributions

Triangle Initiative Personnel and Third Parties may not, directly or indirectly, make political and charitable contributions using Triangle Initiative funds or property unless any such contribution is approved in advance by the Law Department.

Triangle Initiative Personnel and Third Parties, in their personal capacity, may not directly or indirectly make political or charitable contributions to in any way obtain or retain business, direct business to another person or entity, or to obtain an improper advantage for or on behalf of Triangle Initiative.

Auditing and Internal Accounting Controls

Triangle Initiative has other policies that require the company to maintain accurate books and records that properly and fairly document all financial transactions. It is expressly a part of this policy that all employees are responsible for assuring that any transaction of which they are a part be reflected properly and fairly. As such:

- No undisclosed or unrecorded accounts of the company are to be established for any purpose.
- False or artificial entries are not to be made in the books and records of the company for any reason.
- Personal funds must not be used to accomplish what is otherwise prohibited by this Anti-Corruption Compliance Policy.
- No payments to Third Parties shall be made in cash other than documented petty cash disbursements and no corporate checks shall be written to "cash," "bearer," or to a party other than the person or entity entitled to payment.
- Invoices containing vague or ambiguous charges must be returned for clarification.



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- Triangle Initiative Personnel who are aware of a discrepancy or an error in the company's books and records should report that to a Triangle Initiative management.

Reporting Obligations and Review of Complaints

Triangle Initiative Personnel or Third Parties who perceive that an activity or transaction may involve Bribes or Illegal Payments or that any inappropriate or inaccurate information has been recorded in Triangle Initiative's books and records must, subject to applicable law, report such concern to the Law Department. The Law Department is responsible for working with other organizations within Triangle Initiative to evaluate the merits of the reported activity or transaction and report findings of this evaluation in accordance with company procedures.



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