

# Policy Statement: Corruption, Bribery, Whistle Blowing, and Retaliation

Version 1.0 – January 2022

## 1. Introduction to the Policy Statement

Corruption is prevalent all over the world, as well as in Africa and South Africa. It has its devastating impact on all levels of society given that it negatively affects job security, job creation, and the sustainability of businesses. In addition, prices become inflated and the quality of products and services are negatively affected. The impact of systemic corruption affects the most vulnerable people in our society.

As companies specialising in the field of people development, JVR regards the impact of bribery and corruption on people and businesses as absolutely unacceptable. In this regard we believe that all people and all businesses, including JVR, have a critically important role to play in establishing, maintaining, and continuously improving corporate integrity and accountability. We agree that there must be absolutely no tolerance for any form of bribery and corruption, and we are committed to managing the JVR businesses with honesty and integrity. This is essential to ensure the sustainability of our businesses, the safety of our employees, the reputation of the professions we represent, and the reputation and risk of the ethical partners we work with.

## 2. Objectives

The purpose of this JVR Policy Statement on Corruption, Bribery, Whistle blowing, and Retaliation is to clearly state the JVR Africa Group of Companies' sanction of this form of criminality and how we mitigate the risks of those well-meaning people who provide feedback to JVR by way of acting as whistle blowers.

### 3. Measures and Protocols

JVR acknowledges all legislation that deals with crime and corruption. In South Africa this includes the Prevention and Combating of Corrupt Activities Act No. 12 of 2004 (PACCA) as well as the Financial Intelligence Centre Act No. 38 of 2001 (FICA); the Prevention of Organised Crime Act No. 121 of 1998 (POCA); the Public Finance Management Act No. 1 of 1999 (PFMA), as well as the Municipal Finance and Management Act No. 56 of 2003 (MFMA). The Protected Disclosures Act No. 26 of 2000 (PDA) and the Companies Act No. 71 of 2008 also specifically refer to the management of whistle blowers.

#### 3.1 Crime and Corruption

JVR has implemented a wide range of policies and procedures to ensure clarity on the ethical parameters expected from all employees. In addition, the consequences of any criminality, including bribery and corruption are specified in our Disciplinary Code. Employees who work at JVR are not only very carefully- and psychometrically evaluated before being appointed, they also have to read and sign all JVR policies, codes, and follow our Standard Operating Procedures to ensure compliance. Ongoing training, close supervision by team leaders, managers, and supervisors as well as carefully monitored business metrics further support the JVR drive to clean business. In addition, many of the JVR employees are registered with their professional boards, thus ensuring compliance to industry ethical standards. JVR partnerships are also carefully selected to ensure that we only work with like-minded organisations and individuals who have zero tolerance for bribery and corruption.

JVR employees are not allowed to receive gifts, the companies do not make donations to- or are affiliated with any political parties, tenders are competed for through official channels, and all third-party vendors' credentials, history, and possible criminal records are very carefully scrutinised and checked.

Leadership at JVR purposefully maintain a psychologically safe, transparent, professional, and ethical culture at JVR, as this allows for easy access to the leadership of the JVR Africa Group of companies if they feel conflicted or unsure about any decision to be made.

#### 3.2 Whistle Blowers

JVR takes pride in its open, ethical, professional, and fair culture where employees and other stakeholders are encouraged to voice their concerns and raise any issues they may have with regards to the activities in/of the Group of companies. Ongoing employee and stakeholder feedback is regarded as an invaluable source of information.

JVR recognises that whistle blower complaints are often well meant by people who wish the companies no harm. Whistle blowing on issues that could affect JVR's reputation, financial health, or legal risk, can be done without discrimination or retaliation and will be dealt with promptly and efficiently.

JVR plans to implement an automated process for whistle blower complaints in 2022. In the interim all emails can be sent to [whistle-blower@jvrafrica.co.za](mailto:whistle-blower@jvrafrica.co.za) or direct phone calls can be made during office hours to 27 11 781 3705 asking to speak to the JVR CEO or any of the Managing Directors.

Complaints can be done- and will be managed anonymously as per all the JVR POPIA policies. Assurances regarding anonymity and retaliation will be provided by senior leadership, who will reply promptly to the information.

A transparent process of investigation into the complaint will be embarked on. All relevant facts, incidences, and documentation will be required, verified, and fully understood. KPI's will be formulated to ensure there is agreement on what would constitute a successful resolution and outcome of the incident. Regular follow-up with the whistle blower will be done to ensure that no retaliation is tolerated and there remains integrity in the process

## 4. Business Assurances

The Boards, and specifically the CEO and Managing Directors take ultimate responsibility for building an ethical culture, setting an example, ensuring training and teaching of employees, managing relationships with external stakeholders, and ultimately by providing oversight also by monitoring corporate metrics that could possibly indicate corrupt and fraudulent activity.

## 5. Governance, Management Roles, and Accountabilities

Ultimately, the JVR Board of Directors, Managing Directors, and CEO carry the responsibility of ensuring a workplace with zero tolerance and severe consequences for bribery and corruption. Should members of the Boards themselves partake in bribery and corruption, the Companies Act provides for the declaration by a court of individuals as delinquent directors because of gross negligence, wilful misconduct, and breach of trust in relation to the performance of the director's functions within, and duties to the JVR Africa Group of companies.

## 6. In Conclusion

JVR does not tolerate any form of bribery and corruption. We also appreciate the time, courage, and effort taken by those who act as whistle blowers on aspects related to the business survival, compliance, and reputation of integrity at JVR. In addition to carefully selecting those who work for JVR, we invest in ongoing training in a wide range of policies and disciplinary procedures for non-compliance. Early feedback from all stakeholders to the business in terms of risks is highly valued and carefully managed according to national (the South African Protected Disclosures Act No. 26 of 2000) and international legislation and best practice.

## Status and Approval

VERSION	DATE	COMPILED BY	ACTION
1.0	24 January 2022	Dr J de Beer	1 <sup>st</sup> publication
	25 January 2022	E Rust	Language editing and proofreading