



GIFTS AND HOSPITALITY DECLARATION POLICY

Version 2

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Approved by the Board of Trustees on 29 January 2025

SIGNED BY THE CEO:

Date: _____

POLICY REVISION LOG

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TABLE OF CONTENTS

1 DEFINITIONS AND ACRONYMS 4

2. PROBLEM STATEMENT 7

3. INTRODUCTION..... 7

4. OBJECTIVE..... 8

5. SCOPE OF APPLICATION 8

6. LEGISLATIVE AND REGULATORY FRAMEWORK..... 8

7. POLICY PRINCIPLES 9

8. KEY CONSIDERATIONS 10

9. GIFT POLICY EXCEPTIONS..... 11

10. EVALUATING THE APPROPRIATENES OF ACCEPTING GIFTS, HOSPITALITY AND FAVOURS 12

11. KICKBACKS 14

12. HOSPITALITY 14

13. TRAVEL COSTS 14

14. PROCESS FOR DECLARATION BY EMPLOYEES 15

15. PROCESS FOR ACCEPTANCE OF GIFTS BY THE GPF 15

16 DISPOSAL OF GIFTS 16

17 ETHICS OFFICER ROLE 16

18 DEVIATIONS 17

19. BREACH OF POLICY..... 17

20. MONITORING, REVIEW AND COMPLIANCE..... 17

21 APPROVAL 18

1 DEFINITIONS AND ACRONYMS

In this Policy, unless the context indicates a contrary intention, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings -

- 1.1. **“Board”** means the Board of Trustees of the GPF;
- 1.2. **“CEO”** means the Chief Executive Officer of the GPF;
- 1.3. **“Client”** means any person to whom goods and services of the GPF are provided and who has entered into an agreement with the GPF for the provision thereof;
- 1.4. **“Committee”** means a sub-Committee of the GPF Board, or any other Committee constituted by Exco;
- 1.5. **“Corporate Gift”** means a Gift bearing the logo of the company often offered at conferences and other official functions and events either organised by the company or at which the company is sponsoring. It also refers to Gifts presented by foreign delegations or departments to pay respect. For example: T-shirts, Bags, iPads, cell phones, cars etc.;
- 1.6. **“Donation”** means any gratuitous receipt of property or a voluntary Gift such as money, service, or ideas;
- 1.7. **“Employee”** means any permanent or temporary Employee, officer, agent, or independent contractor, who works for the GPF or for the State on a temporary or permanent basis and who receives, or is entitled to receive, any remuneration; and any other person who in any manner assists in carrying on or conducting the business of the GPF and the term 'employed' and 'employment' will have a corresponding meaning;
- 1.8. **“Ethics Officer”** means the Legal and Compliance Manager of the GPF;
- 1.9. **“Executive”** means a member of the Executive Committee of the GPF;
- 1.10. **“Executive Head”** means the Executive heading up a particular department within the GPF;
- 1.11. **“Exco”** means the Executive Committee of the GPF;
- 1.12. **“Financial Year”** means the period 1 April to 31 March;
- 1.13. **“Gift”** means a token which is bestowed voluntarily to the Employee without any expectation of tangible compensation, and for which no direct or indirect contractual obligations are imposed. A Gift may be to one's own benefit, or to that of one's immediate families and relatives. This includes “Corporate Gifts.”

- 1.14. **“Gift and Gratuities Register”** means the monthly register maintained by the GPF wherein all Gifts and Gratuities received by Employees are declared and recorded;
- 1.15. **“GPF”** means the Gauteng Partnership Fund;
- 1.16. **“Gratuities”** means rewards or incentives provided in exchange or for in recognition of completion or delivery of work, a product, or an achievement;
- 1.17. **“Gratification”** is as defined in section 1 (ix) of the Prevention and Combating of Corrupt Activities Act, 2004 (Act No. 12 of 2004) includes -
- 1.17.1. money, whether in cash or otherwise;
 - 1.17.2. any Donation, Gift, loan, fee, reward, valuable security, property, or interest in property of any description, whether movable or immovable, or any other similar advantage;
 - 1.17.3. the avoidance of a loss, liability, penalty, forfeiture, punishment, or other disadvantage;
 - 1.17.4. any office, status, honour, employment, contract of employment or services, any agreement to give employment or render services in any capacity and residential or holiday accommodation;
 - 1.17.5. any payment, release, discharge or liquidation of any loan, obligation, or other liability, whether in whole or in part;
 - 1.17.6. any forbearance to demand any money or money's worth or valuable thing;
 - 1.17.7. any other service or favour or advantage of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil, or criminal nature, whether or not already instituted, and includes the exercise or the forbearance from the exercise of any right or any official power or duty;
 - 1.17.8. any right or privilege;
 - 1.17.9. any real or pretended aid, vote, consent, influence, or abstention from voting; or
 - 1.17.10. any valuable consideration or benefit of any kind, including any discount, commission, rebate, bonus, deduction, or percentage.
- 1.18. **“Hospitality”** means anything .provided to cater for a human need or to show respect to a person or group and can be food, drink, entrance to events, accommodation or entertainment provided free of charge or heavily discounted

and for which no direct or indirect contractual obligation are implied. For example:
Complimentary tickets for soccer, festivals, flights and accommodation etc.

- 1.19. **"HRSEC"** means the Human Resources and Social and Ethics Committee of the GPF;
- 1.20. **"Private benefits"** includes, but not limited to, favours, Donations, grants and Sponsorships that directly or indirectly benefit the public servant;
- 1.21. **"Promotional Materials"** means advertising material provided to Public Servants, such as caps, pens and diaries during official occasions. These Gifts may or may not have any logos displayed on it;
- 1.22. **"PSR, 2016"** means Public Service Regulations, 2016;
- 1.23. **"PFMA"** means the Public Finance Management Act 1 of 1999 (as amended);
- 1.24. **"Sponsorship"** means either cash and/or in-kind fee paid on behalf of an Employee to attend an event or enrol with any institution for academic or any other purpose as more clearly defined in the GPF Sponsorship Policy;
- 1.25. **"Policy Owner"** means the Legal and Compliance Manager of the GPF, who for the purposes of this Policy is also the Ethics Officer;
- 1.26. **"Supplier"** means a third party or outsourced supplier operating as an individual, organization or business that provides the GPF with specialised service in exchange for payment, which service includes but is not limited to consulting, legal, communications, storage, processing and other services; and
- 1.27. **"Trustee"** means a person duly appointed as a trustee of the GPF and a member of the Board.

2. PROBLEM STATEMENT

- 2.1. Public service leaders have the obligation to create "a professional environment that is infused with values of accountability, efficiency, transparency and professionalism".
- 2.2. Implementation of declaration of Gifts & Hospitality has in the past few years been guided and regulated through the Conflict-of-Interest Policy.
- 2.3. This policy presented some gaps and was outdated.
- 2.4. There is a need to align the policy with the current business function of the GPF, best practice, good corporate governance principles and, to recognize the processes and procedures employed by the GPF.

3. INTRODUCTION

- 3.1. Management of Gifts offered in the course and scope of employment and in the Public Service in general, is increasingly becoming complicated and difficult to control. The biggest challenge is that Gifts can have unintended consequences depending on the context in which it was offered and the intentions of the giver. This in the end has the potential for deception as a result of receiving bribes.
- 3.2. The Public Service Regulations, 2016 was introduced to manage acceptance of Gifts and Hospitality in the Public Service.
- 3.3. The GPF as a public entity takes note that the PSR, 2016 is applicable to all Employees in the public service irrespective of salary level.
- 3.4. The PSR, 2016, Chapter 2, Part 1, under section 13 states the following:

"An Employee shall:

 - (a) not receive, solicit, or accept any Gratification, as defined in section 1(ix) of the Prevention and Combating of Corrupt Activities Act, 2004 (Act No. 12 of 2004) from Employee or any person in return for performing or not performing his or her official duties.

Acceptance of any Gratification, Gifts, and Hospitality with the intention of acting dishonest or illegally can amount violation of PRECCA Act.
- 3.5. Furthermore, Chapter 2, Part 2 of the PSR, 2016: The Financial Disclosure requires all SMS members and other designated Employees including Employees working at Supply Chain Management and Finance to disclose

acceptance of Gifts and Hospitality when submitting their financial disclosure to the Head of Department.

- 3.6. This policy has been developed to prevent Employees from being open to allegations of fraud and corruption.
- 3.7. The acceptance of Gifts, Hospitality and favors must be considered with due regard for the need to avoid any suspicion or allegations of improper behavior.
- 3.8. Conflicts of interest can arise where Employees are offered Gifts, Hospitality or other favors which might, or could be perceived to, influence their judgement in relation to business transactions such as the placing of orders and contracts.

4. OBJECTIVE

- 4.1. The objective of this policy is to-
 - 4.1.1. provide clear policy directive on the acceptance of Gifts, Gratuities, Hospitality and retainership for the GPF;
 - 4.1.2. assist the GPF in managing possible conflicts of interest which may arise due to Employees accepting Gifts and Hospitality while undertaking their official duties; and
 - 4.1.3. stipulate the procedure to be followed in seeking permission to accept Gifts to an accumulative value of R 350.00 (three hundred and fifty rand) per year.
- 4.2. This policy should be read in conjunction with the relevant legislation and regulations, namely: Chapter 2, Part 1 & 2 of the Public Service Regulations, 2016 that governs the acceptance of Gifts and Hospitality, and retainership in the public service.

5. SCOPE OF APPLICATION

- 5.1. Due to the broad scope of this policy, specific details cannot be provided, and the onus is on the individual to use his or her judgement to avoid situations where his or her independence could be affected or seen to be affected.
- 5.2. This policy applies to all Employees.

6. LEGISLATIVE AND REGULATORY FRAMEWORK

- 6.1. Public Service Act 103 of 1994;
- 6.2. Public Service Regulations, 2016 Chapter 2, Part 1 Sec 13 (a) and (h)

- 6.3. Public Service Anti-Corruption Strategy;
- 6.4. Prevention and Combating of Corrupt Activities Act no 12 of 2004; Section 3
- 6.5. Prevention of Organized Crime Act 121 of 1998;
- 6.6. Public Finance Management Act no 1 of 1999 (PFMA); and
- 6.7. Treasury Regulations of March 2005, Section 20 Gifts, donations, and sponsorship issued in terms of the Public Finance Management Act, 1999;

7. POLICY PRINCIPLES

- 7.1. Employees are prohibited from directly or indirectly soliciting or accepting Gifts, Hospitality, or Private benefits of any value from any person (natural and juristic) that is contracted to the GPF;
- 7.2. All Employees are required to declare Gifts and Hospitality as and when they are offered to the Employee;
- 7.3. Employees shall not accept any private Gifts, benefits, or item of monetary value (a description and the value and source of Gift with a value in excess of R350.00 (three hundred and fifty rand) from any Supplier or Client or any person for himself or herself during the performance of duties;
- 7.4. Employees are prohibited from accepting cash money (bank note, coins, or any form of currency) as a Gift;
- 7.5. Any Gift that cannot be returned to the person/s from whom it is received will be offered to any charitable institutions identified or selected line with applicable policies on charity Donations in line with the GPF Sponsorship Policy;
- 7.6. Clients, Supplier, or any person, when rendering service to the GPF is prohibited from offering Gifts, Hospitality or Private benefits valued above R350.00 (three hundred and fifty rand) to Employees of the GPF;
- 7.7. Employees are prohibited to directly or indirectly accept or agree or offer to accept any Gratification from any Client, Supplier, or any other person, whether for the benefit of himself or herself or for the benefit of another person;
- 7.8. Employees are prohibited from accepting or soliciting any Gifts, Hospitality, and Private benefits from any person in return for performing or not performing his or her official duties;
- 7.9. In situations where an Employee cannot decline a token of appreciation because it might be considered disrespectful, such tokens must be referred to the Ethics Officer and proposal made to offer it to any charitable institutions identified or

selected in line with applicable policies on charity Donations as provided in the GPF Sponsorship Policy.

8. KEY CONSIDERATIONS

The following key considerations must be assessed prior to accepting the Gift in order to ascertain the context under which the Gift is offered;

- 8.1. The value of such Gifts may not exceed the amount of R350.00 (three hundred and fifty rand) per year.
- 8.2. Employees must never solicit Gifts or any other item of monetary value.
- 8.3. Under no circumstances may an Employee accept cash.
- 8.4. Where acceptance of a Gift is denied, it should be explained to the person/company offering the Gift why it is being refused.
- 8.5. Employees may not accept any Gifts in the run-up to, during, and immediately after a tendering period from tenderers or related parties.
- 8.6. Employees may not discriminate in the choice of Client or Supplier on the basis of receipt or non-receipt of Gifts.
- 8.7. Employees who are offered a Gift to subvert GPF's policies or procedures must report such an offer to the CEO immediately in writing. Failure to report such offers, whether made in jest or otherwise, shall subject the Employee to disciplinary action.
- 8.8. Employees may not use their official position to obtain Gifts for themselves or members of their immediate family.
- 8.9. Employees may not use their official position to demand or request any Gift for carrying out or failing to carry out their duties, not even in jest. Comments to stakeholders that may be interpreted in this way shall subject the Employee to disciplinary action.
- 8.10. The Intention of the giver should be clear, where possible such should be provided for in writing by the giver;
- 8.11. The context under which the Gift is offered should be clearly understood by both the Employee and the giver.
- 8.12. The circumstances in which the Gifts and Hospitality is presented must consider the following:
 - a) It should not be in response to any service delivered by the Employee.

- b) It should not be presented in relation to a transaction made between government and the private sector.
- c) It should be presented in a transparent and open manner.

Both the intention and context need to be taken into consideration. Although the intention of a person presenting a token will not always be clear, an Employee needs to use his/her good judgement to reflect on the givers' intention for giving the token of appreciation. The context (or circumstances) may also assist to clarify the intention. Where the intention is not clear, the Employee is advised to seek advice from the Ethics Officer before accepting the offered Gift or may opt to decline the Gift all together.

9. GIFT POLICY EXCEPTIONS

9.1. Exempted from compliance with the provisions of this Policy are the following:

- 9.1.1. Accepting an occasional invitation to social events and receiving Gifts of nominal value such as pens, calendars and Promotional Materials is generally permissible, provided that acceptance of the invitation or Gift does not improperly influence the member or Employee's judgement and does not create a conflict of interest or the appearance of over-familiarity;
- 9.1.2. Some Gifts (for example, a bouquet of flowers) may be accepted where embarrassment may be caused to the individual or institution if the Gift were refused. In these cases, the Gift received must be disclosed and recorded in the Gifts and Gratuities Register.
- 9.1.3. The prohibition of Gifts and Hospitality excludes all tokens that may be offered or accepted within normal standards of courtesy or protocol by any entity. This includes tokens such as conference packages (pens, bags, t-shirts, etc.) and any Promotional Materials or Gifts that are often offered at functions and events;
- 9.1.4. It is common practice for persons conducting business with the GPF to offer GPF Employees some form of or another of Hospitality. This may range from invitations to social, sporting or cultural events. Such invitations should only be accepted where these are clearly corporate events and not Hospitality being provided personally or solely to the Employee.
- 9.1.5. Invitations to attend professional networking events aimed at improving professional development, GPF's image, presenting GPF's products and services, and/or establishing cordial relations with Clients or potential investors may be accepted. Such invitations require prior written approval by:

- 9.1.5.1. Line Managers for junior staff members;
- 9.1.5.2. Executives for managers within their respective business units;
- 9.1.5.3. Chief Executive Officer for Executives; and
- 9.1.5.4. Chairperson of the Board for the Chief Executive Officer.
- 9.1.6. GPF appreciates that some meetings are held over meals and are a normal way of conducting business. Hence, GPF will not place an arbitrary restriction on the number of business-related meetings over meals GPF Employees may attend. Employees must however ensure that the meals are business related, the host is present and that GPF's independence and reputation are not compromised;
- 9.1.7. The giving and or receiving of Gifts and Hospitality amongst GPF Employees funded privately on widely recognised occasions such as "Farewells," Bosses Day" and "Secretaries Day" is deemed acceptable practice amongst colleagues.
- 9.1.8. Personal Gifts from colleagues may be accepted as tokens of friendship or appreciation. These Gifts may be accepted when they are Gifts of a purely personal nature and where the receipt thereof does not breach the principles set out in this policy.
- 9.1.9. Employees may be considered for an award or a prize, on merit, as a result of endeavours in their field from external parties. The individual may accept such an award or prize on condition that it is recorded.

10. EVALUATING THE APPROPRIATENES OF ACCEPTING GIFTS, HOSPITALITY AND FAVOURS

- 10.1. Before accepting Gifts, Hospitality and favors, the following questions must be considered:
 - 10.1.1. When acceptance is permitted
 - 10.1.1.1. Does it provide a business benefit for the GPF?
 - 10.1.1.2. Does it occur infrequently?
 - 10.1.1.3. Is it moderate and not overly expensive?
 - 10.1.1.4. Is it within the maximum limit recorded in the Gifts and Hospitality Declaration Policy?
 - 10.1.1.5. Is it fair, equitable and impartial?

- 10.1.2. If the Gift, Hospitality, or favor is permissible answer to each question is “yes,” then generally the acceptance is permitted.
- 10.2. When acceptance is not permitted and should be declined
 - 10.2.1. Could it create the perception in the outside world that GPF’s independence and integrity is impaired?
 - 10.2.2. Can it create a conflict of interest?
 - 10.2.3. Could it create a feeling of obligation?
 - 10.2.4. Could it appear to improperly influence a business decision?
 - 10.2.5. Could it result in compromised objectivity?
 - 10.2.6. Does it occur frequently?
 - 10.2.7. Does it exceed the maximum limit recorded in the Gifts and Hospitality Declaration Policy?
 - 10.2.8. Is it cash?
- 10.3. If the answer to any of these questions is “yes” then it is generally not appropriate to accept the Gift, Hospitality, or favor.
- 10.4. If after evaluating the appropriateness of accepting the Gift, Hospitality or favor the individual is still in doubt, the Policy Owner and/or the Ethics Officer must be consulted.
- 10.5. Any Gifts received by individuals in their capacity as GPF Employees must be declared to the Ethics Officer in writing.
- 10.6. The declaration must include -
 - 10.6.1. the date on which the Gift was received,
 - 10.6.2. who it was received from,
 - 10.6.3. the reason for which it was received,
 - 10.6.4. a brief indication of what it was and
 - 10.6.5. the approximate cash value.
- 10.7. The Ethics Officer must maintain a file in which these records are kept and must sign a declaration that the Gift is deemed appropriate.
- 10.8. This register must be managed and maintained by the Ethics Officer, subject to the scrutiny of the Board on a confidential and quarterly basis.
- 10.9. This register shall be kept by the Ethics Officer in a secure location.
- 10.10. All Gifts, Hospitality and favors in excess of R 350.00 (three hundred and fifty rand) per annum, may not be accepted.

11. KICKBACKS

- 11.1. Kickbacks are anything of value provided directly or indirectly for the purpose of improperly obtaining or rewarding favorable treatment.
- 11.2. Kickbacks are not to be given or accepted in any form.

12. HOSPITALITY

- 12.1. Employees must ensure that offers of Hospitality are treated with caution whenever any suggestion of improper influence could arise. Particular care is required where Hospitality is offered by private-sector companies, consultants and individuals seeking a business decision or relationship with the GPF.
- 12.2. Offers of Hospitality beyond the above norms should generally be refused.
 - 12.2.1. Examples are:
 - a) substantial offers to attend social functions •
 - b) travel (national or international) and overnight/ weekend/holiday accommodation
 - c) frequent offers of items such as meals, and
- 12.3. Care must be taken in regard to accepting Hospitality from particular suppliers/contractors on a regular basis.
- 12.4. If an Employee is in doubt about accepting gestures of Hospitality, he or she must consult and obtain permission from the relevant Executive Head.

13. TRAVEL COSTS

- 13.1. If an organisation requests GPF to make a presentation and the organisation is charging participants, GPF charges the party for its services. In this instance the charges normally include the travel costs of the GPF Employee, and any brochures distributed at the function.
- 13.2. In other instances, GPF normally pays for the travel and subsistence costs of an Employee, as it considers the travel costs as part of the Employee's work.
- 13.3. In both the above instances, the Employee cannot accept additional travel reimbursement from the party. Such reimbursement must be paid over to the GPF.
- 13.4. Any travel and accommodation by an Employee at the invitation of a Client or Supplier of the GPF paid for by the invitee may only be undertaken if prior written approval has been obtained from the CEO.

14. PROCESS FOR DECLARATION BY EMPLOYEES

The following process should be followed when accepting Gifts or Hospitality within the GPF

- 14.1. Declaration form for acceptance of Gifts and Hospitality will be made available on the GPF intranet and alternatively they could be obtained from the Policy Owner.
- 14.2. Upon receipt of the Gift or Hospitality or any other Gift that should be declared in terms of this policy, the Employee must complete the relevant declaration form and submit it to the Ethics Officer. Incomplete forms will not be considered and will be returned to the applicant.
- 14.3. If the value of Gift or Hospitality is within the acceptable threshold, the Ethics Officer will record it in the monthly Gifts and Gratuities Register;
- 14.4. If the value of Gift or Hospitality is above the acceptable threshold, it must be politely declined.
- 14.5. Employees who are required to submit their financial disclosure must make sure that they attach the approval letter when submitting their financial disclosure.
- 14.6. The Ethics Officer shall keep the record of Gifts and gratuities in a Gifts and Gratuities Register which will contain all the application of acceptance of Gifts for each Financial Year.
- 14.7. The giver (person who offered the Gift) may be expected to provide information, in instances where the Ethics Officer needs to verify whether the Gift was offered under suspicious circumstances to exclude and ascertain the extent of colluding where such is suspected.
- 14.8. Tokens, Gifts, or Hospitality, offered in a transparent way to a number of people at the same time such as conference packages, pens, T-shirts, etc. are considered acceptable and do not need to be disclosed.

15. PROCESS FOR ACCEPTANCE OF GIFTS BY THE GPF

- 15.1. The Board must approve the acceptance of any Gift to the GPF, whether such Gift is in cash or kind.
- 15.2. All Gifts received for a specific purpose must be deposited in a separate bank account opened specifically for that purpose.
- 15.3. Where it is not apparent for what purpose the Gift is made, the Board must decide how the funds may be utilised.

- 15.4. All Gifts received must be disclosed in the annual financial statements of the Board.
- 15.5. Where Gifts consist of immovable property, prior approval must be obtained from the Provincial Treasury.
- 15.6. The Board must submit to the Provincial Treasury the reasons for and the conditions under which the Gift of immovable property is offered, and the reasons why it proposes to accept the Gift.
- 15.7. Where a donor requests to remain anonymous, the Board must submit to the Provincial Treasury a certificate from both the Public Protector and the Auditor-General, which states that the identity of the donor has been revealed to them, that they have noted it and have no objection to the receipt of the Gift.

16 DISPOSAL OF GIFTS

In terms of section 21.2.3 of the PFMA under acceptance of Gifts, Donations and Sponsorship to the state, the Treasury Regulations state- *"where it is not apparent for what purpose a Gift, Donation or Sponsorship should be applied, the relevant authority may decide how it must be utilised"*.

Therefore, in the GPF-

- 16.1. All Gifts that are declined by Employees will be returned to the person/s who offered them.
- 16.2. In case the giver has not / do not collect the Gift, such Gift will be recorded; and a proposal made to offer it to any charitable institutions identified or selected in line with applicable policies on charity Donations.

17 ETHICS OFFICER ROLE

- 17.1. The Ethics Officer is responsible for management of the Gifts and Hospitality Declaration Policy.
- 17.2. The Ethics Officer shall ensure compliance with regards to policy requirements.
- 17.3. The Ethics Officer shall keep a Gifts and Gratuities Register on all Gifts and gratuities declared for every financial year and report to the HRSEC from time to time.
- 17.4. The Ethics Officer shall monitor the trends associated with Gifts received or offered.

17.5. Where it is found that Gifts are linked with services to be rendered or service already rendered by a Supplier or Gifts are solicited from Suppliers, the Ethics Officer will alert the Chairperson of the HRSEC and the CEO to consider and initiate an investigation.

18 DEVIATIONS

Any deviations from this policy must receive prior approval in line with the GPF Delegations of Authority.

19. BREACH OF POLICY

Breach of any clause contained in the policy shall be subjected to GPF disciplinary procedures.

20. MONITORING, REVIEW AND COMPLIANCE

20.1. Policy Audit

The Ethics Officer shall report on the progress and specific problems experienced in the implementation thereof.

20.2. Policy Review

This Policy is subject to review every third year in its implementation or as and when the need may arise.

20.3. Policy amendments

No amendment (s) may be made to any section(s) of this policy without such amendment (s) first being discussed and validated against prevailing acts, standards, best practices, and regulations by the Policy Owner supported by Exco and HRSEC.

20.4. Policy Compliance

The Legal and Compliance Unit will play a monitoring and evaluation role to determine whether the approved policy provisions will provide compliance assurance and determine whether the approved policy provisions are put in place in each Business Unit within GPF as well as ensure legislative compliance.

21 APPROVAL

This policy is approved by the Board after consideration and recommendation from Exco and HRSEC.