



ANTI-BRIBERY AND CORRUPTION POLICY

POLICY STATEMENT

eZi Remit (PTY) Ltd, herein referred to as ("the Company") is committed to conducting its business ethically, honestly, transparently, and in full compliance with all applicable laws, regulations, and regulatory expectations governing Authorised Dealers with Limited Authority (ADLAs) in South Africa.

The Company adopts a zero-tolerance approach towards corruption, bribery, facilitation payments, fraud, extortion, kickbacks, improper inducements, and any conduct that may compromise the integrity of the Company, its employees, customers, regulators, business partners, or stakeholders.

All directors, employees, contractors, agents, consultants, intermediaries, field agents, and third-party service providers acting on behalf of the Company are required to comply with this Policy.

DEFINITION

Bribery

Bribery is, in the conduct of the Company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by eZi Remit's employees or by third parties acting for or on behalf of eZi Remit.

Corruption

The abuse of entrusted power, authority, position, or influence for personal gain or to benefit another person improperly.

Bribery and Corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Facilitation Payment

An unofficial payment made to secure or expedite routine governmental or business action.

Kickback

Payment, commission, reward, or benefit provided in exchange for favorable treatment or business advantage.

PURPOSE

The purpose of this policy is to convey to all employees and interested parties of eZi Remit the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and corruption and our commitment to ensuring that eZi Remit conducts its business in a fair, professional, and legal manner. This policy further:

- Prevent bribery and corruption in all business activities.
- Promote ethical business conduct.
- Protect the Company's reputation and regulatory standing.
- Ensure compliance with applicable legislation.
- Establish reporting and escalation procedures.
- Provide guidance on gifts, hospitality, sponsorships, donations, and conflicts of interest.
- Support the Company's AML/CFT/CPF compliance framework.

OFFENCE

It is a criminal offence to:

- ***offer a bribe***

- *accept a bribe*
- *bribe a foreign official*
- *as a commercial organisation, to fail to prevent a bribe*

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

SCOPE

This policy applies to all employees of eZi Remit regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement including any person acting on behalf of the company.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

LEGAL AND REGULATORY FRAMEWORK

This Policy is informed by:

- Prevention and Combating of Corrupt Activities Act, 2004 (PRECCA).
- Financial Intelligence Centre Act, 2001 (FICA).
- Companies Act, 2008.
- Protection of Constitutional Democracy Against Terrorist and Related Activities Act (POCDATARA).
- South African Reserve Bank Exchange Control Regulations.
- King IV Report on Corporate Governance.
- Applicable contractual and regulatory obligations.

GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertainment; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from **the Head of Group Compliance**. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from **the Head of Group Compliance**

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

PROHIBITED CONDUCT:

No person acting on behalf of the Company may directly or indirectly:

- Offer Bribes

Offer, promise, authorize, or provide any payment, gift, reward, benefit, favour, or advantage intended to improperly influence any person.

- Receive Bribes

Request, solicit, accept, or receive any improper payment, gift, reward, commission, favour, or benefit.

- Facilitation Payments

Make or authorize facilitation payments under any circumstances.

- Improper Business Influence

Provide anything of value to:

- Government officials.
- Regulatory officials.
- SARB representatives.
- FIC representatives.
- Customers.
- Suppliers.
- Correspondent partners.
- Business introducers.

for the purpose of obtaining an improper advantage.

- **Concealed Payments**
Create false invoices, fictitious expenses, off-book accounts, or misleading records intended to conceal improper payments.
- **Kickbacks**
Participate in any kickback arrangement involving:
 - Vendor appointments.
 - Procurement decisions.
 - Referral agreements.
 - Commission structures.
 - Customer acquisition arrangements.

POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact **the Head of Group Compliance** so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to contact **the Head of Group Compliance** You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Company will ensure that all its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

eZi Remit takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act

of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Company's whistleblowing policy which is available in the employee handbook, or upon request.

