



Gift Policy

1. Purpose

The purpose of this policy is to document the process to be followed on receipt and acceptance of Gifts, avoid and/or mitigate any potential conflict of interest, avoid corruption and ensure fairness in the interest of all Employees of UBUNTU Group and its Subsidiaries.

The policy regulates and controls the receipt and acceptance of gifts from Clients and Suppliers by Employees.

2. Application

- 2.1 This policy is applicable to all Management and Staff of UBUNTU Group and its subsidiaries:
- i. Black Moon Investments (Pty) Ltd
 - ii. Assurity Insurance Brokers (Pty) Ltd
 - iii. Virtusell
 - iv. UBUNTU Concrete Works (Pty) Ltd
- 2.2 This policy does not apply to any individual that has entered into an independent contractor and or Consultancy agreement with UBUNTU Group and its subsidiaries.

3. Definitions

- 3.1 **“Client”** refers to any existing and/or potential future client of UBUNTU Group and its subsidiaries.
- 3.2 **“Employee”** means any temporary or permanent employee of UBUNTU Group and its subsidiaries.
- 3.2 **“Gift”** refers to any delivery/transfer/assignment/ abdication of money, any item of value, service, loan, promise, discount or rebate for which something of equal or greater value is not exchanged.
- 3.3 **“Supplier”** means an existing vendor, contractor, sourcing partner, service provider, distributor and consultants who supply goods, or services to UBUNTU Group and/or any of its subsidiaries as well as any

potential supplier or third party who may in future become a supplier or vendor of goods or services to UBUNTU Group and its subsidiaries.

4. General Prohibition

- 4.1 Employees are prohibited from asking for/soliciting gifts.
- 4.2 The receipt and acceptance of cash is prohibited.
- 4.3 Gifts to the value not exceeding R 500.00 may be received and accepted without the sign-off of the CEO or an Executive Staff Member. Gifts in excess of R 500.00 in value must be signed-off by Line Management prior to acceptance.

5. Procedure for the acceptance of gifts

- 5.1 The receipt of Gifts must be disclosed within 2 days of receipt, by completing the Gift Disclosure Form (Annexure A attached to this Policy) and handed to the Financial Executive.
- 5.2 The Finance department will maintain a Gift Register and update the register with the information received.

Document Control:

The Company reserves the right to make changes to this policy document as and when required, and will endeavor to provide reasonable notice where changes are applied.			
Policy:	Gift Policy	Version:	Vs.1.00
Policy Owner	Human Resources		
Approved by	Exco	S Van Deventer	
Approval Date	03.12.2020		
Published	11.12.2020		