



ANTI- CORRUPTION POLICY

BOARD-LEVEL GOVERNANCE
DOCUMENT

ENTITY: ROADRAK GROUP (PTY) LTD

REGISTRATION NO: 2025/515748/07

SHAREHOLDER: ROADRAK CORPORATE HOLDINGS (PTY) LTD
(2025/896051/07)

VERSION: 2.0

EFFECTIVE DATE: 22 MARCH 2026

STATUS: CONFIDENTIAL / INTERNAL GOVERNANCE

1. DOCUMENT CONTROL

Version	2.0
Effective Date	22 March 2026
Prepared By	Compliance & Legal Department
Reviewed By	Executive Committee (EXCO)
Approved By	Board of Directors
Next Review Date	21 March 2027

1.1 CHANGE HISTORY

Date	Version	Description of Change	Author
22/07/2025	1.0	Initial Policy Draft	Legal
22/03/2026	2.0	Annual Review & Alignment with King IV & PRECCA Updates	Compliance

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2. POLICY STATEMENT

ROADRAK GROUP (PTY) LTD (“the Company”) is committed to the highest standards of integrity, ethics, and transparency. We maintain a **ZERO-TOLERANCE** stance against all forms of corruption, bribery, fraud, and unethical business practices. This policy reinforces our commitment to the Prevention and Combating of Corrupt Activities Act (PRECCA) and the principles of King IV.

We do not offer, give, solicit, or accept bribes or improper inducements. Every transaction must be lawful, every tender must be fair, and every relationship must be based on merit and professional integrity.

3. PURPOSE AND SCOPE

3.1 PURPOSE

The purpose of this policy is to provide a clear framework to prevent, detect, and respond to corruption and to protect the Company's reputation, assets, and legal standing in the South African infrastructure and construction sectors.

3.2 SCOPE

This policy applies to ROADRAK GROUP (PTY) LTD and its shareholder, Roadrak Corporate Holdings (Pty) Ltd. It is binding upon:

- Directors and Shareholders;
- Executive and Senior Management;
- Permanent, Temporary, and Contract Employees;
- Subcontractors, Consultants, and Professional Service Providers;
- Joint Venture Partners and Agents acting on behalf of the Group.

4. DEFINITIONS

4.1 Corruption: The abuse of entrusted power for private gain, including the offering or receiving of an advantage to influence an action.

4.2 Bribery: Offering, promising, giving, or accepting an undue advantage to influence an official or private party.

4.3 Facilitation Payment: Small payments made to secure or speed up routine governmental or business actions (strictly prohibited).

4.4 Kickback: A negotiated bribery in which a commission is paid to the bribe-taker as a "quid pro quo" for services rendered (e.g., awarding a subcontract).

4.5 Conflict of Interest: A situation where an individual's personal interests interfere with their professional duties toward ROADRAK.

5. PROHIBITED CONDUCT

The following conduct is strictly prohibited at ROADRAK GROUP:

1. **Bribery:** Offering or accepting cash or non-cash benefits to influence business decisions.
2. **Kickbacks:** Receiving a cut of a contract price from a supplier or subcontractor.
3. **Tender Manipulation:** Bid-rigging, price-fixing, or sharing confidential tender information with competitors.
4. **Collusion:** Secret agreements between parties to distort fair competition.
5. **Fraudulent Invoicing:** Submitting or approving inflated or false invoices for work not performed.
6. **Facilitation Payments:** Paying "grease money" to officials for permits, inspections, or border clearances.
7. **Nepotism:** Hiring or awarding contracts to relatives without disclosure and competitive merit.

6. GIFTS, HOSPITALITY AND ENTERTAINMENT

ROADRAK recognizes that occasional, modest hospitality is part of business culture, but it must never create an obligation or influence a decision.

- **Prohibited:** Cash gifts, gifts during a tender period, or gifts exceeding R2,000 without EXCO approval.
- **Declaration:** All gifts received or offered with a value exceeding R500 must be recorded in the Group Gift Register.
- **Integrity:** Hospitality must be transparent, reasonable in value, and for a legitimate business purpose only.

7. TENDERING AND PROCUREMENT INTEGRITY

As a construction and infrastructure entity, procurement is our highest risk area. We mandate:

- **Segregation of Duties:** No single individual may have the power to select, approve, and pay a supplier.
- **Verification:** All CIDB grades, B-BBEE certificates, and tax clearances must be independently verified.
- **Supplier Code of Conduct:** All subcontractors must sign an Anti-Corruption Declaration as part of their appointment.
- **Fair Play:** We do not engage in "cover pricing" (submitting fake high bids to help a competitor win).

8. WHISTLEBLOWING AND PROTECTION

The Company encourages employees to report suspected corruption. In accordance with the **Protected Disclosures Act**:

- Reports can be made to the CEO, Finance Director, or via the confidential email: ethics@roadrak.co.za.
- **Non-Retaliation:** No person will be dismissed, demoted, or harassed for reporting corruption in good faith.
- Internal investigations will be conducted with strict confidentiality.

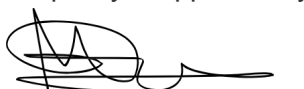
9. DISCIPLINARY AND LEGAL ACTION

Breach of this policy is considered **Gross Misconduct** and will lead to:

- Immediate disciplinary action, potentially resulting in summary dismissal.
- Termination of contracts with suppliers, subcontractors, or partners.
- Reporting to the South African Police Service (SAPS) and the Hawks as required by Section 34 of PRECCA.
- Civil recovery of losses through legal litigation.

10. APPROVAL

This policy is approved by the Board of ROADRAK GROUP (PTY) LTD.



Managing Director

Date: 22 March 2026

ACKNOWLEDGEMENT & NOTES

EMPLOYEE/CONTRACTOR ACKNOWLEDGEMENT

I, the undersigned, acknowledge that I have received, read, and understood the ROADRAK GROUP Anti-Corruption Policy (Version 2.0). I agree to comply with all provisions and understand that any breach will result in disciplinary and/or legal action.

Name & Surname	
ID/Passport Number	
Designation	
Signature	
Date	

ADMINISTRATIVE NOTES

Use this section for recording specific regional compliance notes or audit observations.