



CJA Telecommunications - Gift Policy

CJA Telecommunications is committed to an ethical environment for all employees. This gift policy applies to all employees of CJA. Any violation of this Gift Policy may result in disciplinary action, including but not limited to, termination of employment.

Statement of Policy

Business entertainment and small business gifts can build goodwill and are part of normal relationships with our business partners. However, gifts can also create a perception of conflict of interest that can undermine the integrity of our business relationships and could be subject to potential abuse.

This gift policy applies to the giving and receiving of gifts by CJA employees, their family members and relatives and any other person or entity acting at the direction of any CJA employee. Any such person may give or accept gifts (defined below), either directly or indirectly, only in compliance with this gift policy. CJA sets specific limits to the types and value of gifts that may be accepted or given and requires visibility and disclosure of gifts regardless of type or value as described below.

What is a gift?

A "gift" is anything of value that is given to or received from any person or organisation with which any CJA entity does business or is actively considering doing business (e.g., suppliers, consultants, clients) or with which any CJA entity competes or any person employed by any such organisation, or that otherwise directly or indirectly relates to a person's employment with any CJA entity, whether not to or to any of such entities or persons. Gifts include – but are not limited to – gifts, meals, lodging, loans, cash, gratuity, favour, entertainment, fee, commission, kickback, favourable terms or discounts on any product of service, services, equipment, prizes, products, transportation, use of vehicles, vacation, or other facilities, stocks or other securities, home improvement, tickets, gift certificates, gift cards, discount cards, memberships, employment or consulting relationships or services, or any other form of compensation and benefit.

A gift is considered given or received by a CJA employee if the gift is given or received by any of the following:

- The employee
- Any family member or relative of the employee, including, but not limited to, payments to or by, or employment of, any such family member or relative
- Any other person or entity at the employee's direction or for the employee's benefit

If you are at all uncertain whether or not something is a gift, you must assume it is a gift and is subject to this gift policy (e.g., if a supplier or a potential supplier who is also a personal friend gives you a birthday present). It is important to avoid even the appearance of impropriety. Consequently, every transaction with an active or potential supplier, competitor, consultant, business partner or client of any CJA entity should be considered and evaluated as a gift even if you believe the transaction involves fair and full consideration between the parties (e.g., if a supplier provides employment to a family member or relative or if an employee buys or sells a car from or to an CJA business partner of its employees)

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2	23/10/2018	10/2021	Revised	M. Croukamp	P. Harrison	Z. Janssen	
Signatures							

The following guidelines are intended to assist employees and supervisors in evaluating and determining the appropriateness of various types of gifts (whether given or received):

**Appropriate gifts:** using good judgement and moderation, occasionally receiving from or offering to employees of a non-governmental entity gifts or entertainment of nominal value is appropriate and can create goodwill and enhance business relationships, provided the applicable requirements specified in this gift policy are complied with

**Inappropriate gifts:** other types of favours, gifts and entertainment are simply wrong and unacceptable, either in fact or in appearance, so that they are never permissible regards of any other provision of this gift policy. No one can accept, request, offer, give or approve the following types of gifts in connection with work at CJA:

- Any amount of cash or cash equivalents, including, but not limited to, gift certificates, gift cards or discount cards (even if only redeemable for merchandise), stock, or other securities
- Favours, gifts, or entertainment that would be illegal or violate any law, regulation, or any other CJA policy, including, but not limited to, bribes, kickbacks, or the like
- Anything as part of an agreement to do anything in return for favours, gifts, or entertainment.
- Involves travel or accommodations being provided by a person or entity other than CJA or the employee (including, but not limited to, transportation and/or lodging regardless of the value).

**Recordkeeping**

Each employee is responsible for keeping a copy of each notification, approval and substantial business determination, as applicable, that he/she send and/or receives under this gift policy. If an employee cannot provide copies of proper notifications, approvals and/or substantial business purpose determinations proving compliance, the employee will be in violation of this gift policy.





**Receiving gifts: Notification and prior approval**

**Notification**

1. Gifts must be reported by the applicable employee in writing (via email) within 3 business days of receipt to all of the following (a "Gift Notification"):
  - 1.1 The employee's immediate line manager
  - 1.2 The employee's department's most senior executive
  - 1.3 HR

**When,**

2. A gift that has a value equal to or greater than R100 (Reporting Threshold) or,
3. Alone, or together with previous gifts received from the same of affiliated sources (including any persons or entities controlling, controlled by, or under common control with each other), equal or exceeded R500 (Prior Approval Threshold) during any calendar year,


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**Each gift notification must include, at a minimum:**

1. A complete description of the gift and the nature of the business purpose of the gift.
2. The actual value of the gift or a reasonable estimate of the value with documentation, if available, supporting the estimate.
3. The person or the entity that provided the gift and their relationship with CJA
4. The specific recipient of the gift (e.g., employee, family member),
5. The date of the gift

Any Discretionary decisions made under this Gift policy and the application thereof can only be waived by the CEO.

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