
ANTI - BRIBERY AND CORRUPTION POLICY

1. NLA has a zero-tolerance attitude to bribery and corruption activity. This policy applies to all directors, officers, staff, and representatives of NLA, as well as all consultants, agents, contractors, subcontractors, and third party service providers of NLA, where appropriate.
2. NLA conducts its business with honesty, integrity, and the highest ethical standards. It expects the same standards of professionalism to be maintained in all its business activities, and in its relationships with those with whom it conducts business.
3. NLA shall not knowingly engage in or participate directly or indirectly in any way in any unlawful activity or corrupt practice ("**ABC activity**") including, but not limited to, accepting, offering, promising or giving undue gratification (including, without limitation, any gift, payment, loan, reward, inducement or other advantage) from or to a third party (whether a public or private person) fraudulent acquisition of any interest, bribery, embezzlement, fraud, insider trading or abuse of privileged information, nepotism or favouritism, or receive or obtain any benefit of whatever nature which is not legally due.
4. NLA shall not knowingly associate with or have any business relations of whatsoever nature or conclude any transactions with any third party who is involved in any corrupt or unlawful practices contemplated by 2. above. Reasonable marketing expenditure and charitable and political donations are excluded from such practices, provided such expenditure and/or donations have been motivated and approved by the shareholders of NLA, and provided such expenditure and/or donations neither depend on, nor are made to achieve any benefit of whatever nature which is not legally due.
5. NLA is committed to compliance with all applicable anti-corruption laws, including but not limited to, the Prevention and Combating of Corrupt Activities Act No. 12 of 2004 of the Republic of South Africa, the U.S. Foreign Corrupt Practices Act of 1977, the Australian Criminal Code Amendment (Bribery of Foreign Public Officials) Act of 1999 and the UK Bribery Act 2010.
6. NLA has implemented procedures to ensure that :
 - 6.1 it will notify the appropriate authorities promptly upon becoming aware that any of its directors, officers, staff, or representatives of NLA, or any consultant, agent, contractor, subcontractor, or third party service provider of NLA, where appropriate, is involved in any ABC activity;
 - 6.2 its directors, officers, staff, or representatives of NLA, or any consultant, agent, contractor, subcontractor, or third party service providers of NLA, where appropriate, are aware of this policy;

- 6.3 it will perform appropriate risk based anti-corruption due diligence on any consultant, agent, contractor, subcontractor, or third party service providers of NLA, where appropriate, will keep records of the same, and take reasonable measures to ensure those consultants, agents, contractors, subcontractors, or third party service providers of NLA, where appropriate comply with the provisions of this policy;
- 6.4 it will keep and maintain accurate and reasonably detailed books and financial records of expenses and receipts in connection with the services it provides to its clients, and payments made or received pursuant to such services rendered, and shall, upon request, as soon as reasonably practicable but within 14 (fourteen) days of a request for same, provide any information and reasonable assistance to any appropriate authority to audit any books and financial records to verify compliance with applicable anti-corruption laws, and otherwise to reasonably co-operate with any lawful investigation of any related matters.
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