

4.2 Gifts, hospitality and personal gain

Directors, officers and employees (full-time and part-time) should not accept any gift, hospitality, reward, favours, benefit or other incentive from suppliers, contractors, consultants or customers where this could affect such director's, officer's or employee's impartiality, influence a business decision or lead to the improper performance of an official duty.

Notwithstanding the above, the following gifts, hospitality and entertainment may be accepted and subsequently declared:

- marketing material (such as pens, notebooks and the like) and/or advertising matter of a nominal commercial value;
- occasional business entertainment such as lunches, cocktail parties or dinners which are necessary to promote business matters; or
- occasional personal hospitality such as tickets to South African based sporting events or theatres.

The aforementioned gifts, hospitality and entertainment may not be accepted in circumstances where there is an expectation by the giver to receive any undue and/or improper advantage from the recipient or where it is given in order to influence a business decision or lead to the improper performance of an official duty.

Prior written permission must be obtained from management before accepting an invitation to attend any of the above events. The request for permission must be done in writing and clearly state the purpose of the event. In addition, the relevant details must be entered in the gifts and entertainment register, which is kept by the general manager and/or company secretary.

The cost of any transport, air tickets or accommodation must be borne by the employee, except where transport is provided by a contractor or supplier from a central location to and from a stadium.

Directors, officers and employees (full-time and part-time) may also not under any circumstances offer, give, accept or agree to accept a gift of cash, whatever the value.

Directors, officers and employees (full-time and part-time) may in no way authorise or give effect to any transaction on behalf of Northam in which they or any member of their families could personally gain, directly or indirectly, whether financially or otherwise.

Marketing material



Business entertainment



Personal hospitality

