	Business Integrity Management	Version: 1.0
	Anti-Bribery and Corruption policy	Date: 01 Dec 2020
		BI1-META-010-DOC1

1 PURPOSE AND SCOPE

META Group (META) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the committing of any crime, any involvement in bribery will also reflect adversely on its image and reputation. META absolutely forbids corruption and the paying or receiving of bribes for any purpose. The aim of this policy is to limit exposure to bribery and corruption which are defined in this policy as:

Bribery - Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another's behalf.

Corruption – Corruption is the abuse of entrusted power for a private gain.

Facilitation payments - Facilitation payments are any payments made (except where comprised in a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement.

This policy is applicable to META and its operational companies (OpCos).


2 PROCEDURE

2.1 Approach

META prohibits bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on behalf of META in order to:

- gain any commercial, contractual or regulatory advantage for META in a way which is unethical; or
- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual; or
- induce the improper performance of any function that is of a public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

When acting for META, political contributions are not allowed, and charitable contributions are allowed only in accordance with the Donations, Gifts and Hospitality Policy. Facilitation payments are not permitted or condoned by META.

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2.2 General requirements

In order to limit exposure to bribery and corruption it is important to implement the following measures:

- Widely communicate this Anti Bribery & Corruption policy and inform employees about the role of the Compliance Officer as the first point of contact for queries;
- Conduct periodic training for employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encourage employees to be vigilant and to report any suspicion of bribery;
- Rigorously investigate instances of alleged bribery and assist the police and other appropriate authorities in any resulting prosecution; and,
- Take firm and vigorous action against any individual(s) involved in bribery.

The Compliance Officer for META Group is: Enrico NORA (enrico.nora@METAafrica.com)

2.3 Relations with suppliers and other third parties

META believes that all transactions ought to be conducted with honesty and integrity and we expect everyone with whom META has commercial dealings to meet those standards.

META requires all hospitality or gifts given or received, which are subject to managerial review in accordance with the Gifts, Donations and Hospitality Policy, to be included in the Gift Register. All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to conceal improper payments.


META expects its suppliers to respect our ethical standards in the context of their own particular culture. The relationships with our suppliers are based on the principle of fair and honest dealings at all times and in all ways.

2.4 Reporting a concern

If an employee or contractor has a concern about any issue or suspicion of bribery or corruption the employee must raise it with his or her line manager or compliance manager at the earliest possible stage. If unsure about whether a particular act constitutes bribery or corruption, employees are advised to raise it with their manager. Alternatively, reports can be made confidentially through the Grievance Report form on the META website or by sending an e-mail to: whistleblower@METAafrica.com.

META is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in acts of bribery or corruption. META encourages openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

The prevention, detection and reporting of bribery or corruption, including attempted bribes offered to any individual, is the responsibility of all persons within or associated with META.

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2.5 Further Clarification

META recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another.

This policy is not meant to prohibit practices that are customary in a particular market, are proportionate and are properly recorded; for example

- Normal and appropriate hospitality;
- The giving of a ceremonial gift on a festival or at other special times;

Please refer to the Gifts, Donations and Hospitality Policy for more details.

3 COMMUNICATION

The Anti-Bribery and Corruption Policy should be available and accessible to all META employees, including the employees of its operational companies, as well as contractors.

4 APPROVAL AND VERSION CONTROL

Approval:

	Date	Name	Position	Signature
Created:				
Reviewed:				
Approved:				

Revision History:

Revision no.	Revision Date	Name	Description