

Introduction:

Flynt (Pty) Ltd is dedicated to upholding the highest standards of ethics and integrity in all aspects of its operations. As part of this commitment, we have established this Anti-Bribery and Corruption Policy to outline our stance against bribery, corruption, and fraudulent activities. This policy extends to all stakeholders, including but not limited to employees, managers, owners, clients, suppliers, and partners.

Policy Statement:

Flynt (Pty) Ltd maintains a zero-tolerance approach towards bribery, corruption, and fraud. We are committed to conducting business in a lawful, ethical, and transparent manner at all times. Our stakeholders are expected to act with integrity, honesty, and fairness in all business dealings and interactions, both internally and externally.

Applicability:

This policy applies to all individuals associated with **Flynt (Pty) Ltd**, including employees, managers, owners, contractors, consultants, suppliers, and any other third parties acting on behalf of the company. Compliance with this policy is mandatory for all individuals, regardless of their position or employment status.

Definitions:

Bribery encompasses the offering, giving, receiving, or soliciting of any undue advantage or inducement, whether directly or indirectly, to influence the actions or decisions of others in order to gain improper advantage. Examples of bribery may include, but are not limited to:

- Offering or accepting gifts, entertainment, or hospitality with the intention of influencing business decisions.
- Making or receiving payments, kickbacks, or commissions to secure favorable treatment or contracts.
- Extending personal favors or benefits to individuals in positions of authority to obtain preferential treatment.

Company Commitment:

Flynt (Pty) Ltd is committed to upholding the highest standards of integrity and ethical conduct in all business activities. Our employees, managers, and owners are prohibited from engaging in

any form of bribery, corrupt behaviour, or fraudulent practices. Specifically, individuals associated with the company must not:

- Offer, promise, or provide anything of value to obtain an unfair advantage.
- Engage in deceptive or dishonest practices to circumvent company policies or legal requirements.
- Misrepresent facts or provide false information to gain an unfair advantage.
- Shift blame or responsibility onto others to evade accountability.
- Engage in fraudulent activities that undermine the company's values or violate applicable laws and regulations.

Reporting Suspected Instances:

Flynt (Pty) Ltd encourages the prompt reporting of any suspected instances of bribery, corruption, or fraud. Transparency and accountability are fundamental to our organizational culture, and we rely on the vigilance of our stakeholders to maintain the integrity of our operations. Suspected instances can be reported through the following channels:

- **Whistleblowing Mechanism:** A dedicated whistleblowing platform is available on our website to facilitate anonymous reporting of concerns related to bribery, corruption, or fraud. Reports submitted through this channel will be promptly investigated by external auditors to ensure impartiality and confidentiality.
- **Direct Reporting:** Alternatively, individuals may choose to report suspected instances directly to their immediate supervisor, manager, or any member of the management team. All reports will be treated with the utmost confidentiality and investigated thoroughly.

Non-Retaliation Assurance:

Flynt (Pty) Ltd is committed to protecting whistleblowers from any form of retaliation or victimization as a result of reporting suspected instances of misconduct. We value the courage and integrity of individuals who come forward with genuine concerns, and we will take appropriate measures to safeguard their interests and well-being.

Conclusion:

Flynt (Pty) Ltd reaffirms its unwavering commitment to combating bribery, corruption, and fraudulent activities in all aspects of its operations. This policy serves as a testament to our dedication to ethical business practices and underscores our responsibility to uphold the trust and confidence of all our stakeholders.