

# NYSSAWEALTH



## ANTI-BRIBERY AND CORRUPTION POLICY

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NYSSA WEALTH (PTY) LTD

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## ANTI-BRIBERY & CORRUPTION POLICY

### A. POLICY STATEMENT

Within the financial crime arena, bribery and corruption is highly topical at national and international level.

Nyssa Wealth (Pty) Limited is committed to operating within the laws of any jurisdiction in which it conducts business, and in a way that is consistent with the Nyssa Wealth (Pty) Limited Code of Conduct.

Nyssa Wealth (Pty) Limited has implemented a robust framework to deter and prevent bribery and corruption.

This Anti-Bribery and Corruption Policy prohibits the actual or attempted use of any form of bribery or corruption, either directly or indirectly on Nyssa Wealth's behalf, to advance its business interests.

This framework and Policy Statement is designed to safeguard Nyssa Wealth's reputation and business confidence.

The UK's Bribery Act 2010 is regarded as a global leader in terms of legislation, highlighting four specific offences and six principles for a good ABC policy. These are not prescriptive principles but are intended to be flexible and outcome focused.

In general, these principles are:

1. Applying proportionate procedures, based on the size, nature, scale and complexity of each entity
2. Acquiring top-level commitment from the Board and senior management
3. Starting with a risk assessment
4. Performing due diligence at all times
5. Communication, including training, to ensure awareness across the organization
6. Monitoring and review

Nyssa Wealth shall consider each of these guidance and ensure that best practice is applied.

# NYSSA WEALTH

## B. IDENTIFYING AND PREVENTING BRIBERY AND CORRUPTION

### DEFINING BRIBERY AND CORRUPTION

For the purposes of this Nyssa Wealth (Pty) Limited Policy, a bribe is anything of value given, offered, promised, accepted, requested, or authorised (in each case, directly or indirectly) with the intent that a person who is trusted or expected to act in good faith or with impartiality, performs that function improperly or in order to obtain or retain an advantage in the course of business.

Corruption can be defined as the misuse of public office or power for private gain or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption generally involve the undue influence of an individual in the performance of their duty, whether in the public or private sector.

## C. PROHIBITION ON BRIBERY AND CORRUPTION

Nyssa Wealth (Pty) Limited employees are not permitted to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

Nyssa Wealth (Pty) Limited also prohibits the use of facilitating (otherwise known as facilitation) payments (payments made to a public or government official or employee for their benefit, to improperly expedite or secure the performance of governmental action by a governmental agency), whether directly or through third parties.

## D. TYPES OF BRIBERY AND CORRUPTION RISK

Nyssa Wealth's Policy Statement identifies bribery and corruption risks in three key areas: dealing with and through third parties; the provision and receipt of gifts and entertainment and facilitating payments.

## E. STEPS TAKEN TO PREVENT BRIBERY AND CORRUPTION

Nyssa Wealth (Pty) Limited has controls in place to identify and prevent bribery and corruption.

These steps include, but not limited to, the use of commercial obtained lists of Political

individuals/entities, for screening purposes, as well as the use of the SSI to understand the customer activity and related parties.

## F. RELATED POLICIES AND PROCEDURES

Bribery and corruption risks are addressed in this document together with other matters relating to employee discipline and conduct through a number of other Nyssa Wealth (Pty) Limited policies, programs and procedures. These policies include the Anti-Money Laundering and Counter-Terrorism Financing Policy Statement that incorporate employee due diligence, employee training and awareness and customer identification procedures, etc.

Nyssa Wealth (Pty) Limited also includes as a significant part of this Anti Bribery and Corruption Policy Statement, the Gifts and Entertainment Policy, &/or Compliance Manual in addition to the

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# NYSSAWEALTH

other related local country policies and guidance regarding employee Code of Conduct and Ethical Behaviour.

Copies of these policies are made accessible at all times to all employees.

## G. THIRD PARTY DUE DILIGENCE

In dealing with third parties, engaged to act 'for and on behalf of' or under a specific contract, Nyssa Wealth will undertake appropriate due diligence to ensure that any such party enforces a robust code of conduct and/or anti bribery and corruption program within their own organisation. This requirement applies to any organisation, wherever they are globally based, that Nyssa Wealth engages with whether it be on a one-off or on-going basis.

## H. CONSEQUENCES OF BRIBERY AND CORRUPTION POLICY BREACH

Nyssa Wealth (Pty) Limited will ensure in a timely manner and through training programs that all employees understand:

- Nyssa Wealth's corporate obligations under the applicable local legislation, regulations and/or rules;
- the personal (compliance and legal) obligations of all employees
- the consequences of non-compliance with the applicable legislation within the jurisdictions of operation, regulations and/or rules.
- the consequences of non-compliance with Nyssa Wealth's policies and code of conduct; and the specific procedures which are relevant to the work/role of the employee.

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