



Frequently Asked Questions (FAQ's) – Gifts and Entertainment

INTERNAL ONLY

Document Information	
In support of	Gifts and Entertainment Standard
Target audience	All Absa Group Limited Employees
Business Owner	Phumelele Zwane Designation: Head of Ethics
Custodian	Pamela Du Plessis Designation: Manager Compliance
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Frequently Asked Questions (FAQ's) – Gifts and Entertainment

Purpose

Absa businesses (collectively, the “firm”) expects its Employees, regardless of the function that they perform for the firm (i.e., front office, personal banking, infrastructure and other support areas) to:

- Comply with all applicable Gifts and Entertainment (“G&E”) laws and regulations in the jurisdictions in which the firm conducts business:
 - Observe the highest ethical standards in carrying out its business activities;
 - Avoid material conflicts of interest, actual or perceived; and
 - When giving and receiving any Gifts and Entertainment, employees should consider the reputation impact and whether it is an appropriate way of representing the firms’ products and services or establishing business relations.

The purpose of this document is to address commonly asked questions with respect to the Standard. The questions and answers in these Frequently Asked Questions (“FAQs”) are not exhaustive nor meant to be prescriptive, but should offer guidance with respect to the typical queries received or issues observed by Compliance. Any capitalised terms used but not defined in this document have the meanings ascribed to them in the [Gifts and Entertainment Standard](#).

For the detailed procedure refer to the [Gifts and Entertainment Standard](#). All Employees must ensure that all the risks and controls as documented in the procedure are adhered to at all times.

Frequently Asked Questions (“FAQs”)

1. Giving and Receiving Gifts and Entertainment

1.1 Does the [Gifts and Entertainment Standard](#) apply to receiving as well as giving of G&E?

Yes, the [Gifts and Entertainment Standard](#) applies to both the giving and receiving of Gifts and Entertainment (G&E). Gifts and Entertainment are subject to scrutiny due to the elevated risks from a bribery and corruption perspective. Please remember that all Gifts and Entertainment should be entered into the Gifts and Entertainment system (C-Zone).

1.2 How do I disclose and/or submit a Gifts and Entertainment request for pre-approval?

Gift and Entertainment disclosures and/or requests for pre-approval must be submitted through the Gifts and Entertainment system (C-Zone).

1.3 Why the Business Justification/Rationale is required and what is a legitimate business purpose?

The firm supports Gifts and Entertainment activity that is legal, appropriate given the circumstances, and, otherwise, serves the legitimate goal of building business relationships. Thus, the Business Justification / Rationale for any particular G&E is fundamental to determining whether such activity poses a legal, regulatory or reputational risk.

Examples of a legitimate business purpose include, but are not limited to, a demonstration of the firm’s products and services, a meeting to discuss a Business Contact’s needs concerning a particular product or service offered by Absa, a meeting to learn about a Business Contact’s financial or other business-related needs.

To ensure that the request is very clear for both the Approver and Compliance, it would be helpful to include information such as the agenda that you will be following, a copy of any invitations that may have been offered or received, the reason the G&E is relevant, etc.

1.4 What would be considered as an ‘inappropriate’ Entertainment?

- Entertainment of a sexually explicit or discriminatory nature or which is indecent or inappropriate.

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- Entertainment either provided or received in venues such as hostess bars; other establishments where there is nudity or illegal services; or, in venues which support conduct that would generally make a particular group of people feel uncomfortable or unwelcome, would fall into this category.

Always consider whether the Entertainment could cause reputation concerns for Absa. You should also consider cultural and reputational issues for those you may be inviting to an event and ensure that nothing is offered that may contravene your Business Contacts' own internal policies and applicable legislation.

1.5 How do I determine whether my Gift or Entertainment is lavish or excessive?

The recognised method of determination for lavish or excessive is to consider if the ordinary man in the street would objectively consider the amount spent to be excessive. The [Gifts and Entertainment Standard](#) and the Absa [Anti-Bribery and Anti-Corruption Policy](#) prohibits the giving and receiving of 'anything of value' to and from a Business Contact in order to improperly obtain or retain business or a business advantage. Additionally, no G&E, whether provided or received, should (or be perceived to) exert improper influence or create the impression of an improper inducement, bribe or conflict of interest:

- The value of any G&E, whether individually to a Business Contact or collectively between the firm and the particular entity to which such Business Contact is affiliated,
- The frequency of such activities in respect of a particular Business Contact,
- The timing and circumstances under which such G&E is given or received,
- The nature of a G&E and even the seniority of a Business Contact

Are all factors which need to be considered in determining whether something is lavish or excessive?

It is the responsibility of each Employee to be aware of all such factors in making a G&E decision and Compliance is here to provide guidance should you have any queries.

1.6 Should I disclose entertainment of minimal value e.g. teas, coffee or sandwiches?

Business related meals or refreshments that are of minimal value and not in excess of R200.00pp (for example teas, coffee or sandwiches) need not be declared on C-Zone. This exception does not apply to FAIS, Restricted, and Pension fund related entertainment.

1.7 What should I do if my G&E is subject to additional regional and/or business – specific requirements?

There may be additional regional and/or business-specific requirements applicable to the G&E. If you are unsure that any such requirements exist, contact the G&E Compliance team for guidance. Remember that ignorance of the requirements is not an excuse for breach of the Gifts and Entertainment Standard.

1.8 Will the firm reimburse any G&E that is a breach of the [Gifts and Entertainment Standard](#)?

No. Seeking reimbursement for G&E that does not comply with the [Gifts and Entertainment Standard](#) or failure to follow conditions or requirements will constitute and be recorded as a breach of the Gifts and Entertainment Standard. The firm will not be responsible for any G&E expense incurred in breach of the [Gifts and Entertainment Standard](#) and may seek reimbursement from you for such amounts.

1.9 Does the [Gifts and Entertainment Standard](#) apply to G&E between firm Employees and Contingent Workers?

The [Gifts and Entertainment Standard](#) generally does not apply to G&E between firm Employees.

1.10 Is Corporate Enhancements/Charitable giving covered under the [Gifts and Entertainment Standard](#)?

The request to support a Corporate Enhancement event is not subject to the [Gifts and Entertainment Standard](#). However, if a Business Contact is invited to a Corporate Enhancement event either sponsored by Absa or at which Absa has purchased tickets, or if an Employee is invited to a Corporate Enhancement event by a Business Contact, it would be deemed to be Entertainment and subject to the same approval/disclosure requirements as any other Entertainment. Contact your Compliance Officer if unsure.

1.11 What would be considered as “prompt” disclosure for G&E received?

All gifts/entertainment received must be logged through C-Zone within fifteen (15) business days of receiving the gift/entertainment, however for G&E requests that are above the thresholds, pre-approval is required prior receiving G&E. e.g invite to an educational conferences with value above the threshold.

1.12 How do I handle Gifts given to a team of people?

If you intend to send a Gift to a team of recipients, it should be disclosed to Compliance when seeking pre-approval. For example, if you are planning to send a Gift basket to a Sales team for example, you should include all individual recipients in the pre-approval request. If a gift is received for your team, it is to be apportioned amongst the members remembering to log it if the value per person exceeds R2000.00.

1.13 How is the aggregate value of a G&E assessed?

When considering the appropriateness of G&E, the “aggregate value” of past G&E provided/received by the same Business Contact should be reviewed. The concept of aggregation applies to the market value of the G&E given or received from a particular Business Contact taking into consideration the following:

- Time Period – the market value given or received over a time in the past, including frequency of the G&E activity, reviewed on the basis of last twelve months and taking into consideration anything already approved in the future;
- Collectively by Absa – the market value given (or received) by Absa across business units and geographies to (or from) a particular Business Contact;
- Collectively by Business Contact – the market value given (or received) by Absa to all Business Contacts of a particular client, entity or organization across departments and locations;
- Collectively by Participants – the aggregate market value given to all participants at an Entertainment including any guests of a Business Contact; and/or
- Related to a Single Event – the aggregate market value of G&E given or received relating in one event or occasion or that involves the same (or similar) participants at multiple venues or over multiple days.

1.14 What is the aggregation time period when considering the appropriateness of a G&E?

The ‘aggregate value’ is calculated on a rolling 12-month basis. Therefore, for giving or receiving G&E, the applicable time period for aggregation purposes is the last twelve months and anything already approved going forward.

1.15 If the Absa host is not present at an event, is this still considered Entertainment?

No. If a host is not present at an event, it will be considered a Gift and the relevant thresholds will apply. Note that the pre-approval thresholds for Gifts are lower than that of Entertainment, thus your invitation to a client for an event may be subject to pre-approval if no Absa host is able to participate in the event as the threshold may have been reached.

1.16 What shall I do if I unexpectedly receive Entertainment from a Business Contact (for example, following a business meeting) which would have required Business Approver and Compliance preapproval?

Promptly submit a request in the system. This may be routed to your Business Approver for approval. Following that, the request may be forwarded to the G&E Compliance team for review.

Ensure that all details outlining the circumstances of the request are included as soon as you are able to. If you cannot do so timeously through the G&E system (C-Zone), email your relevant Compliance contacts and Business Approver. In the absence of mitigating circumstances, this would constitute as a breach of the Gifts and Entertainment Standard. Prompt self-disclosure will be considered a mitigating factor and may affect the outcome of the breach.

1.17 How is the ‘per person’ cost calculated for Entertainment?

To calculate the per person cost, you must add the total cost of Entertainment along with the cost of ancillary expenses (e.g. taxi to and from an entertainment venue, any food and beverage costs, etc.) to be provided or received and divide by the number of participants.

1.18 Is pre-approval required for providing G&E to guest(s) of a Business Contact, including guest(s) of a Restricted Person?

Entertainment invitations extended to guest(s) of a Business Contact (including, without limitation, partners and/or children) or the provision of Gifts to guest(s) of Business Contacts will be approved on an exception basis only and require pre-approval by the relevant Business Approver.

Requests for guest Entertainment and/or Gifts should not be routinely requested and should be carefully considered by the requesting party before they are submitted.

The business purpose of inviting the guest to an Entertainment or providing a Gift to a guest of a Business Contact must be clearly articulated in seeking approval for the guest Entertainment or Gift.

Factors such as the nature and value of the Entertainment or Gift (both individually as well as in the aggregate over time to the same Business Contact), the jurisdiction in which such Entertainment or Gift is contemplated, whether there are any inducement concerns, and regulatory and reputational risk implications must be fully reviewed and considered before Business Approval may be given. In addition, such requests may require escalation to, and approval from, senior business management and regional G&E Compliance management, depending on the circumstances.

1.19 What if I do not know the cost per person of an event that I am to attend?

Every effort to get the approximate cost should be made, including where possible asking the Business Contact for details of the market value of the event if necessary. If not possible, it would be acceptable to use a reasonable estimation of the cost such as using past knowledge of such events if necessary, to submit the pre-approval request. If an unrealistic value is used, this may be picked up as part of Compliance surveillance and evidence of the reasons for the low estimation may be requested.

2. Updating/Amending Approved Gifts and Entertainment Requests

2.1 What should I do if I need to update information on an approved request?

If changes need to be made to an approved request, (e.g., attendees, venue, proposed budget, etc.) promptly inform the G&E Compliance team so that we may assist with amending your request accordingly. Depending on the type of change needed and the reason, approval from the relevant Business Approver may be necessary.

Failure to make changes to your G&E request in a timely manner and before the event date may result in a breach of the Gifts and Entertainment Standard. If in doubt, notify your regional G&E Compliance team as soon as you are aware of a necessary change. This can be done by email if required.

2.2 Can I go ahead and offer G&E to a Business Contact after raising a request for pre-approval?

No, you should wait until your request is fully approved by both the relevant Business Approver and the G&E Compliance team before offering the Entertainment or Gift. If there is a specific urgency, contact your Business Approver and the G&E Compliance team. Providing G&E prior to receiving approval will constitute a breach of the [Gifts and Entertainment Standard](#).

2.3 Does paying out of pocket for G&E to a Business Contact require Compliance pre-approval?

All Entertainment (e.g., meals, hospitality, transportation and accommodation) above the applicable thresholds set forth in the [Gifts and Entertainment Standard](#) requires Compliance pre-approval. Additionally, attempting to circumvent the Gifts and Entertainment Standard by paying for G&E (to a Business Contact) personally out of pocket in your capacity as an Absa employee and not seeking reimbursement from the firm without Business Approver permission would be deemed inappropriate and may be considered a breach of the Gifts and Entertainment Standard. This includes topping up the difference of the pre-approval thresholds to match the total expense or otherwise participating in prohibited conduct and not seeking reimbursement of the expense. Regardless of whether an Absa business contact related Gift or Entertainment is being paid for personally or via Absa expenses, pre-approval will be required if above applicable thresholds.

3. Restricted Persons and Restricted Entities

3.1 How do I determine if my Business Contact is a Restricted Person or is employed by a Restricted Entity?

Restricted Persons are typically individuals who are representatives or employees of organs of state, state-owned entities (national or local) or entities controlled or owned by a state. Individuals may also be considered restricted if they are:

- Individuals exercising a legislative, administrative or judicial function
- Candidates for public office,
- Officials of a political party,
- United States labour unions,
- Regulatory and/or exchange personnel,
- Members of a royal family.
- Other criteria which may render an entity to be restricted are:
 - When the government(s) controls a majority of votes attaching to shares or otherwise exercises control over the entity,
 - Financial dependence on a government,
 - Performance of functions that are public/government-related in nature.

If you are unsure whether a person or entity may be considered restricted, please contact Compliance for guidance.

3.2 What 'special consideration' would I need to make when providing Entertainment to a Restricted Person?

Local laws, regulations, rules or ethics codes, may be applicable to a Restricted Person which may prohibit or otherwise restrict Entertainment provided to a Restricted Person (e.g. a Restricted Person may be prohibited from attending a 'Premier' Entertainment Event).

If so directed by the G&E Compliance team, an invitation to a Restricted Person for Entertainment must be made in writing (whether a hard copy, email or registration document) and include a specific disclaimer. Additional specified procedures may also apply for inviting a Restricted Person. Contact your regional G&E Compliance team for further guidance.

Remember that some jurisdictions have much stricter requirements for G&E, e.g. the US, Hong Kong, Korea, Japan and Germany. If you are providing G&E to any Restricted Person in other jurisdictions, ensure you are aware of the local restrictions by contacting the G&E team where necessary.

4. Business Contact

4.1 Are internal candidates / firm recruits considered Business Contacts per the Gifts and Entertainment Standard?

No, Absa internal candidates / firm recruits are not considered Business Contacts nor are they considered External Suppliers.

4.2 Are prospective clients considered Business Contacts per the Gifts and Entertainment Standard?

Yes, prospective clients are considered Business Contacts. As such, G&E provided to or received from these parties must be submitted for pre-approval in line with established [Gifts and Entertainment Standard](#) thresholds. For any prospective client that has not gone through the client onboarding process, additional checks may be required as part of the approval including reputational checks.

5. Seeking Business Approver and Compliance Pre-Approval

5.1 What sort of Entertainment requires pre-approval?

All client-related Entertainment including meals and hospitality to be provided or received that are subject to the pre-approval thresholds as established in the [Gifts and Entertainment Standard](#).

5.2 Is pre-approval required for accepting and providing travel and/or accommodation support?

Pre-approval must be obtained from a Business Signatory and reviewed by a designated 2nd Line Reviewer, where **travel and/or accommodation** is included.

Where travel and/or accommodation support is provided for a Business Contact, it must be provided at no higher class or standard than that which would be provided by the firm to one of its employees.

5.3 Who else can provide Business Approver approval if my Business Approver is out of the office?

In such circumstances, a Business Approver is usually the next level in the management hierarchy. If there is difficulty finding a Business Approver for urgent approval, please contact Compliance for assistance.

5.4 I was invited by another Absa Employee to an Entertainment with a Business Contact. Who is responsible for taking the steps to seek pre-approval for the Entertainment?

It would be the responsibility of the inviting employee to ensure that the entertainment request is submitted timeously and to ensure that all Absa employees attending the event are added as participants to the request.

What we would need to avoid is a duplication of requests for the same event, which will affect the aggregation for the business contact.

5.5 How do I seek pre-approval for G&E if I am away from the office and do not have access to the G&E system or other pre-approval G&E system?

An email should be submitted to the G&E Compliance team and the relevant Business Approver as soon as possible providing details of the G&E. At the earliest opportunity, a G&E request must be submitted through the G&E system (C-Zone).

5.6 Do I need to contact the Business Approver if the approved Business Contact cannot attend and an alternative Business Contact from the same client entity will attend in his/her place?

Yes, approval is only valid for the specific requested Business Contact. Any changes to the facts of a preapproved G&E should be escalated to the G&E Compliance team to allow for the request to be reopened and considered.

5.7 What is my responsibility in accepting/giving G&E to/from a Business Contact whom I also have a personal relationship with?

Gifts and Entertainment that you provide or receive to or from your Business Contacts with whom you also have a personal relationship with, may create an appearance of a conflict of interest. In such a case, the Employee should promptly escalate to the relevant Business Approver (and where appropriate, to Compliance) to discuss the circumstances, including the fact that a personal relationship exists with such Business Contact and determine whether the proposed G&E may give rise to a conflict of interest that would not be permissible under the Gifts and Entertainment Standard. For Restricted Persons, Compliance involvement is required and the determination must be notified in writing by the Employee.

5.8 Do I need to seek pre-approval for G&E provided during a roadshow event?

Yes, unless such G&E is deemed part of the deal transaction expenses and/or reimbursed in full by the Business Contact, they would be treated as in scope of the Gifts and Entertainment Standard and thus subject to pre-approval if the Gifts and Entertainment Standard thresholds are met. Consult the G&E Compliance contacts for guidance.

5.9 Do I need to seek pre-approval for incurring travel and/or accommodation expenditures for an event speaker at an Absa sponsored event?

Pre-approval is always required when providing travel and/or accommodation expenditure, regardless of whether the recipient is a Business Contact or a speaker at an event put together, or sponsored by Absa or whether the total value is below the thresholds stipulated in the Standard.

6. External Suppliers

6.1 What is an External Supplier

An External Supplier is defined as an entity, which is not part of the Absa Group and is not an Absa client, but performs operational functions or provides goods and services to Absa or on behalf of Absa (e.g. Consultancy firms, Law firms including Panel Law firms, IT providers, Recruitment Consultants etc.). This will also include firms we recommend to clients even though we are not in a supplier relationship with them, for their products or services. Potential suppliers are also included in this definition. The term External Supplier relates to the relationship you have with the entity and not the relationship the entity has with Absa in general. Therefore, if you are being offered entertainment by your client, the relationship for you is a client relationship regardless of whether your client also has a vendor relationship with another part of the Bank.

6.2 What are the differences between a Management Consultant and an External Supplier?

Management Consultants are also considered External Suppliers. However, the Firm has instituted more stringent parameters with regard to the exchange of G&E with Management Consultants, as discussed below.

Management Consultants are firms that may provide services related to organisational change management but would also be considered firms that offer a variety of services and with whom we may be contracted to use just one service, i.e., the accountancy arm of EY. In this example, EY is a Management Consultancy by virtue of the many services they are able to provide and even though we expect only to deal with the Accountancy arm for support or advice etc. EY would be considered a Management Consultant.

6.3 Do the External Supplier requirements mean we can still provide Gifts and Entertainment (G&E)?

Absa can provide G&E to External Suppliers subject to the [Gifts and Entertainment Standard](#).

6.4 Can I give or receive G&E to a Management Consultant such as EY or Deloitte?

Entertainment to External Suppliers and Management Consultants will only be allowed:

- If a Management Consultant/External Supplier is contracted to provide a service for Absa, entertainment will only be permitted in connection with the specific ongoing project or service. Therefore, business will be required to provide tangible business justification with every entertainment request submitted which will be reviewed at Compliance's discretion.
- Entertainment, such as coffees and light business hospitality engagements may be accepted where the value is below R500.00 per person. Such events must be disclosed/logged on the gifts and entertainment system (C-Zone).
- Compliance pre-approval must to be sought in instances where a business lunch exceeds the R500.00 per person threshold.
 - This amount should not exceed the R1000.00pp limit.
 - The review and approval by Compliance will be limited to the occurrence of the following events:
 - Working breakfasts & lunches (as long as this is part of a deal/business related meeting),
 - Educational conferences,
 - Industry-wide seminars to which the Banking industry participates in,
 - Stages of engagements - Consulting and onboarding phase (post the successful tender bids),
 - Seasonal Events (Year –end functions) where Absa staff are not the majority attendees,
 - The giving and receiving of gifts and/or entertainment to spouses/partners/children of External Suppliers or Management Consultants will not be permitted,
 - The giving and receiving of social or lavish entertainment will not be permitted. i.e. (Sporting events, Hunting trips, Concerts etc.).

This is because accepting G&E from a supplier could lead to potential conflict of interest.

6.5 What if the External Supplier is both a supplier and client of Absa?

The External Supplier relationship is in scope for this Standard and in all instances of receipt of G&E in relation to the vendor relationship, this Standard applies. If entertainment is being offered in relation to the client relationship normal G&E guidance will apply.

6.6 What happens if a business meeting runs significantly over time at an External Supplier's offices and they bring in an unexpected sandwich lunch?

You can accept a working lunch, light refreshments or a light meal as long as this is part of a deal/business related meeting, this will be subject to the R1000.00 limit.

6.7 What happens if an External Supplier or Management Consultant gives me a gift?

The giving and receiving of gifts is generally discouraged however seasonal gifts may be accepted from External Suppliers and Management Consultants to a limit of R500.00.

If returning a gift may be culturally unacceptable and cause offence, donate the gift to charity (as guided by the Citizenship Team) and record the item in the relevant G&E system, advising on which charity the item was donated to. In the case of high value gifts, provide evidence of the donation, i.e. a confirmation of receipt from the charity, etc.

6.8 Can I attend a conference that is relevant to my role?

Business conferences, seminars, educational breakfasts, and industry forums, example e.g. roundtable discussions attended by a number of entities are permitted from both Management Consultants and External Suppliers. These types of event should be recorded in the relevant G&E system before accepting the invitation.

6.9 Can I attend the networking drinks after the educational event or conference?

If the event was approved and appropriate for you to attend, you can attend the networking drinks provided that this networking is open to all who attended the educational event and was not directed at you or a select group only.

6.10 Can I attend an event such as a sporting event, during which there will be opportunity to learn?

You would not be able to attend, or receive tickets to any sporting event, concert, or social event.

6.11 Are potential External Suppliers included within the new Standard?

Yes, this Standard applies to all existing External Suppliers and any potential External Suppliers.

6.12 I am a member of an External Supplier's Board or Committee as a representative of Absa. Am I allowed to attend post-board meeting dinners?

Yes, in line with the R1000.00 limit. Anything accepted must be logged in the G&E system (C-Zone). Should the meal or restaurant be considered lavish or expensive, these meals should not be accepted or the cost of your meal should be paid for by Absa.

6.13 Are contractors/contingent staff classed as external suppliers?

No, if a contractor or contingent staff is working within Absa and adhering to internal Absa policies then they would not be classed as an External Supplier, however anything offered that is lavish or out of the ordinary should be brought to Compliance G&E teams' attention.

6.14 Are entities that we do regular business with such as Visa, MasterCard, Exchanges, Ratings Agencies, etc. considered as External Suppliers?

For the purposes of this Standard, all of the above are considered as External Suppliers. We understand that in some parts of the business, it may be necessary to meet with these groups. In these circumstances, contact the G&E Compliance team to discuss the case, however remember that you are able to attend events subject to the R1000.00 entertainment limit.

6.15 Are Introducers considered as External Suppliers?

Approved introducers that have been formally registered and with whom we have a formal agreement and are held on the Approved Introducer list held by the Anti-Bribery and Corruption team in Financial Crime are not considered to be External Suppliers. Any other Introducer would be considered an External Supplier and these rules would apply to them.

6.16 What are we permitted accept from External Suppliers?

Where Absa does not constitute a large proportion of the attendees, you are able to attend educational conferences and industry and breakfast seminars where the main purpose is education. You are also permitted to attend end of year parties if they are held in the holiday period only and are attended by a number of other firms. All other invitations to social events should be rejected or paid for personally with only the T&E limits being claimable from Absa.

6.17 What are we permitted accept from Management Consultants?

Where Absa does not constitute a large proportion of the attendees, you are able to attend educational conferences and industry and breakfast seminars where the main purpose is education. You are also permitted to attend end of year parties if they are held in the holiday period only and are attended by a number of other firms.

7. RECORD OF VERSION CONTROL / UPDATES

Date	Author / Source	Change
13 November 2018	Email received from: Cheryl Sacks Circular date: 13 November 2018 Circular number: 817/2018	New Frequently Asked Questions (FAQ's) – Gifts and Entertainment Published <ul style="list-style-type: none"> Version 1.0
13 November 2019	Email: Cheryl Sacks Circular date: 13 November 2019 Circular number: 1006/2019	Annual Review <ul style="list-style-type: none"> Reference updated to refer to the Gifts and Entertainment Standard. Gifts and Entertainment Policy retired. Inclusion of C-Zone - Gifts and Entertainment System
1 October 2020	Email from: Kabelo Seakgoe Circular date: 1 October 2020 Circular number: 1026/2020	Annual review <ul style="list-style-type: none"> Version 3.0
21 January 2022	Email from: Cheryl Sacks	Annual review <ul style="list-style-type: none"> Version 4.0