

FRAUD POLICY

1. The fraud policy is established to facilitate the development of controls which will aid in the detection and prevention of fraud against GL.
2. Fraud is defined as the intentional, false representation or concealment of a material fact for personal financial gain and to GL's prejudice.
3. This policy applies to any fraud, or suspected fraud, involving employees as well as consultants, vendors, contractors, partners or any other parties with a business relationship with GL.
4. A service level agreement must be established with the bank stipulating what the bank is liable for in the event of a loss.
5. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to GL.
6. Management shall put in place mechanisms to assist in detecting and preventing fraud, misappropriations, and other inappropriate conduct.

Actions constituting fraud

7. The following actions shall be regarded as constituting fraud:
 - Forgery or alteration of any document or account belonging to GL
 - Forgery or alteration of a cheque, bank draft, or any other financial document
 - Misappropriation of funds, securities, supplies, or other assets
 - Impropriety in the handling or reporting of money or financial transactions
 - Profiteering as a result of insider knowledge of company activities
 - Disclosing confidential and proprietary information to outside parties
 - Disclosing to other persons securities activities engaged in or contemplated by the company

Additional misconduct

8. Accepting or seeking anything of material value from contractors vendors or persons providing services/materials to the GL with the exception of gifts less than R400 in value.
9. Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment; and/or any similar or related inappropriate conduct

Reporting procedures

10. Any employee who suspects dishonest or fraudulent activity shall notify the CEO immediately (or if the case concerns the CEO, the Chair of GL Board) and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act. The employee or other complainant may remain anonymous.

Investigation responsibilities

11. The CEO (or Exco, if the case concerns the CEO) has the primary responsibility for the initial investigation of all suspected fraudulent acts.
12. If the investigation substantiates that fraudulent activities have occurred, the CEO will issue reports to Exco or if the case concerns the CEO it will be reported to the Board.
13. Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and the Board as will final decisions on disposition of the case.

Authorisation for investigating suspected fraud

14. Members of the Investigation Unit shall have:
 - Free and unrestricted access to all Company records and premises, whether owned or rented; AND
 - The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities when it is within the scope of their investigation.

Confidentiality

15. GL treats all information received confidentially.
16. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the CEO, Exco or GL's legal representative. No information concerning the status of an investigation will be given out.
17. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect GL from potential civil liability.

Termination of service

18. If an investigation results in a recommendation to terminate an employee, the recommendation will be reviewed for approval by the CEO in the case of a staff member; and Exco in the case of the CEO; before any such action is taken. Any action taken will be in accordance with GL's disciplinary code and procedures, as set out under "Human Resources."