

GLENCORE

**PHOLISI E E  
KGATLHANONG LE  
BONWEENWEE LE  
PIPAMOLOMO**



## Matseno

Bonweenwee le pipamolomo ga di mo molaong e bile ga se maitsholo a mantle. Di koafatsa setšhaba, di dira gore molao o lebelwe kwa tlase, mme di kotsi thata mo tswelopeleng ya ikonomi le mo boitekanelong jwa tiragatso ya mebaraka. Go palelwa ke go berekana le kgonagalo ya bonweenwee le pipamolomo go ka nna ga senya khampani le/kgotsa batho leina mme ga dira gore go dirwe dipatlisiso, re duele difaene le/kgotsa dikatlholo tse dingwe.

Ga re dire bonweenwee mme e bile ga re duele dipipamolomo, go sa kgathalesege gore a ke tlwaelo kgotsa mokgwa mo lefelong la rona. Seemo sa Glencore fa go tliwa mo kgannyeng ya bonweenwee se phepafetse: go sololediwa, go duelwa, go neela tetla, go kopa kgotsa go amogela pipamolomo le mesola e mengwe e e sa tshwanelang ga go a lettelesega.

Pholisi e e Kgatlhanong le Bonweenwee e supa kafa Glencore e dirang dilo ka teng mo go thibeling pipamolomo le mefuta e mengwe ya bonweenwee.

## Pholisi eno e dira mo go bomang?

Pholisi eno e dira mo badiring botlhe, bakaedi le badiredi, mmogo le baabi ba ditirelo ba ba kafa tlase ga kaelo ya Glencore, ba ba berekelang ofisi ya Glencore kgotsa thuo ya bodirelo e e laolwang ka tlhamalalo kgotsa e se ka tlhamalalo kgotsa e e dirisiwang ke Glencore plc lefatshe lotlhe.

Re nna le tlhotlheletso mo ditsamaisong tsa kgwebo tsa bomphato tse re sa di laoleng ka go ba kgothaletsa go itshwara ka tsela e e tsamaelanang le Melaometheo ya rona le Melao.

## Maitlamo a rona ke eng?

Re ka se emele pipamolomo ya mofuta ope fela, e ka tswa e le ya modiredipuso kgotsa ya motho wa poraefete.

Ga re sololetse, neelane kgotsa go naya tetla ya pipamolomo ya mofuta ope fela, go akaretsa tsamaiso ya dituelo, e ka tswa e le ka tlhamalalo kgotsa e se ka tlhamalalo, go modiredipuso kgotsa motho wa poraefete.

Ga re kope kgotsa go amogela dipipamolomo tsa mofuta ope fela, e ka tswa e le ka tlhamalalo kgotsa e se ka tlhamalalo.

Pipamolomo e ka nna ya madi kgotsa e e seng madi, ya selo se se tshwaregang kgotsa se se sa tshwaregeng. Pipamolomo e ka nna, kgotsa e ka tsamaisiwa e le:

- dituelo tsa madi
- dimpho kgotsa boitlosobodutu
- diphokoletso madi, dikadimo le/kgotsa go tshegediwa ka madi ka melawana e e seng ya kgwebo
- dipusetso madi kgotsa tuelo ya madi e e seng kafa molaong malebana le ditirelo tse o di diretsweng

- go duela balekane ba kgwebo madi a a fetang a a lebeletsweng
- go dirisiwa ga dithoto ka tlhwatlhwa e e fokoditsweng kgotsa mahala
- diketleetso, meneelo ya bopelotshweu le dipeeletso tsa setshaba
- meneelo ya sepolotiki
- mmereko kgotsa boithutela-tiro, kgotsa
- tshedimosetso kgotsa thuso.

E le go laola kgonagalo ya rona ya pipamolomo le bonweenwee, re dirisa mekgwatiriso e e farologaneng le melawana e e amanang le ditirisano le badiredipuso, dimpho le boitlosobodutu, balekane ba rona ba kgwebo, go etleetsa le meneelo, meneelo ya sepolotiki le go bolokiwa ga direkoto.

Re nna re le malala a laotswe kaga ditshupo tsa bonweenwee le pipamolomo le go di bega kwa Lefapheng la Tatelomolao.



## **Badiredipuso**

Ditirisano le badiredipuso di na le kgonagalo e e kwa godimo ya bonweenwée kgotsa tsela e bonweenwée bo lejwang ka yone. Re nna kelotlhoko ka mo go kgethegileng fa re buisana le badiredipuso, re refosana dimpho le boitlosobodtu le bone kgotsa re ba thusa.

## **Dituelo tsa tsamaiso**

Mo dikgaolong dingwe, badiredipuso ba ka nna ba kopa dituelo tse dinnye, tse di itsegeng jaaka dituelo tsa tsamaiso e le go itlhaganedisa dilo kgotsa gore o direlwe tiro nngwe ya puso e e leng ya gale le gale e e jaaka go ntsha diphemiti, dilaesense, kgotsa ditokumente tsa semmuso; go rulaganya dipampiri tsa puso tse di jaaka di-visa; tellelelo ya go fetisiwa ga dilo kwa melewaneng; go amogela tshireletso ya mapodisi; go neelana ka ditirelo tsa mmasepala; kgotsa go berekana le dithoto tse di tläng ka sepalangwa.

Dituelo tsa tsamaiso ke mofuta wa pipamolomo. Le ka motlha ga re duele, kgotsa go neela tetla ya gore go, duelwe tuelo ya tsamaiso. Fa re kopiwa go duela madi a a seng kafa molaong a tirelo e re e diretsweng, ga re a tshwanelo go duela mme re tshwanetse go itsise ba Lefapha la Tatelomolao.

## **Dituelo tse motho a patelediwang le go tshosediwa go di duela**

Glencore e baya kwa pele tshireletsego ya mo mmeleng le ya botsogo ya badiri botlhe ba yone le baabi ba ditirelo. Fa botsogo jwa rona kgotsa tshireletsego di le mo kotsing, re tsaya dikgato tse di utlwalang gore re efoge kotsi. Mo maemong a a ka diregang sewelo, seno se ka akaretsa go duela modiredipuso e le go netefatsa gore re sireletsegile mo maemong a a rileng. Re tshwanetse ra bega ditiragalo dipe fela tse di ntseng jalo kwa Lefapheng la Tatelomolao ka bonako ka mo go kgonegang fa re babalesegile go dira jalo.

## **Dimpho le boitlosobodtu**

The proper management of the giving and acceptance of gifts and entertainment is key to avoiding the risk they present of actual or perceived bribery or corruption.

Tsamaiso e e tshwanetseng ya go neela dimpho le go di amogela le ya boitlosobodtu e botlhokwa mo go tileng kotsi e di ka e lereng ya pipamolomo kgotsa bonweenwée jo bo dirlweng kgotsa jo bo ikakanyediwang fela.

Re neelana fela kgotsa go amogela dimpho le boitlosobodtu tse di:

- dirwang ka bopeloetshweu, ka nako nngwe, tse di mo selekanyong le tse di tshwanetseng
- supang mokgwa o montle wa kgwebo o o tlwaelegileng, le
- mo mpaananeng.

Ga re neelane kgotsa go amogela dimpho le boitlosobodtu:

- ka boikaelelo kgotsa tebelelo ya gore re tlhotlheletse go dirwa ga ditshwetso kgotsa boitshwaro jo bongwe go itlhaganedisa dilo kgotsa gore o direlwe tiro nngwe ya puso e e leng ya gale le gale
- ka boikaelelo jwa go bona tsholegelo molemo epe e e sa siamang kgotsa e e sa re tshwanelang
- tse go nang le kgonagalo e e utlwalang ya gore di ka tsewa ka tsela epe fela e le pipamolomo, kgotsa
- tse di tläng e le madi a a seatleng, tse di akaretsang dikarata tse di dueletseng kwa pele kgotsa dikarata tsa mpho tse di ka fetolelwang mo mading a a seatleng.

## **Diketleetso, meneelo ya bopelotshweu le dipeeleetso tsa setshaba**

Le ka motlha ga re neelane ka ketleetso, moneelo wa bopelotshweu kgotsa peeletso ya setshaba e le go timetsa motlhala wa pipamolomo, kgotsa go iponela tsholegelo molemo e e sa siamang ya kgwebo.

Re netefatsa gore pele ga re tsenela diketleetso, dipeelestso tsa setshaba kgotsa go ntsha meneelo ya bopelotshweu re dira tshekatsheko ya ditshwanelego tsa kgwebo tsa kgonagalo ya kotsi. Re baya leitlho tiriso e e tshwanetseng ya matlole a rona kgotsa ditsompelo fa go tlhokega gore re dire jalo.

### **Meneelo ya sepolotiki**

Ga re batlane le ditsela tsa go tlhotlheletsa mokgwatsamaiso wa sepolotiki ka mekgwa e e sa siamang kgotsa ya bonweenwee. E le gore re fokotse kotsi eno, ga re ntshe moneelo ope wa matlole kgotsa ditsompelo go tshegetsa matsholo ape a sepolotiki, mokgatlo wa sepolotiki, ntlhopeng wa sepolotiki kgotsa mokgatlho ope fela o o ikamantseng le dipolotiki.

### **Balekane ba kgwebo**

Re lebeletse gore balekane ba rona ba kgwebo ba dumelane le maitlamo a rona a boitshwaro jo bo siameng mmogo le mekgwa ya go tsamaisa kgwebo e e supang maikarabelo. Le ka motlha ga re letlelele molekane wa kgwebo go nna le seabe mo pipamolomong kgotsa bonweenwee mo boemong jwa rona.

Re kgatlhegela go itse gore balekane ba rona ba kgwebo ke bomang ka go diragatsa porogeramo e e theilweng mo kgonagalang ya kotsi ya Itse Momphato wa Gago.

E le go laola kgonagalo ya rona ya pipamolomo le bonweenwee tse di amanang le balekane ba kgwebo, re diragatsa ditsela tsa go laola dilo tse di mmalwa le mekgwatsamaiso go akaretsa go tlholwa pele, tshekatsheko ya ditshwanelego le baya dilo leitlho, re dirisa mokgwa o o theilweng mo kgonagalang ya kotsi.

Re diragatsa ditsela tse di oketsegileng tsa go laola dilo malebana le balekane ba kgwebo ba ba nang le kgonagalo e kwa godimo ya bokotsi, ba ba jaaka basimolodi ba kgwebo, balekane

ba bomphato, batlhotlheletsi ba peomolao, bagakolodi ba tsa kgwebo kgotsa bagakolodi ba ba buisanang le badiredipuso mo boemong jwa rona. Re dira tshekatsheko e e tseneletseng e e theilweng mo kgonagalang ya kotsi pele ga re tsenela dikamano tsa mofuta ono, go re thusa go kguna go lemoga, go sekaseka le go fokotsa kgonagalo ya bonweenwee e e nnang gone ka ntlha ya dikamano tseno. Fa go tshwanelang teng, gape re tswelela pele ka go baya leitlho le go sekaseka sesha ka metlha dikamano tsa rona le balekane ba rona ba kgwebo ba ba nang le selekanyo se se kwa godimo sa bokotsi.

Mabapi le go kopanngwa ga dikgwebo le go rekiwa ga dikgwebo, re dira tshekatsheko e e tseneletseng ya ditshwanelego ya pele ga theko ya kgwebo mme morago ga moo re kopanye porogeramo ya Setlhophya sa Glencore ya Tatelomolao le ya dikgwebo tseno tse re di laolang kgotsa go di tsamaisa.

### **Go kopanngwa ga dikgwebo le go rekiwa ga dikgwebo**

Fa re akanyetsa go tsenela go kopanngwa ga dikgwebo kgotsa go rekwa ga dikgwebo, re dira tshekatsheko ya tshwanelego e e theilweng mo kgonagalang ya bokotsi gore re tlhaloganye dikgonagalo tsa pipamolomo epe fela le bonweenwee tse di amanang le tirisano eo ya kgwebo mme re tseye dikgato go lepalepana le mathata ape a a lemogilweng. Koo re iponelang teng tshwanelo ya go laola kgotsa go tsamaisa kgwebo, ka bofeso fela re tsenya tirisong pholisi eno, mmogo le mekgwatiriso le ditaolo.

### **Go bolokiwa ga direkoto tse di nepagetseng**

Re netefatsa gore ditirisano tsotlhe tsa kgwebo di rekotiwa ka nepagalo mo dibukeng tsa Glencore le direkoto tumalanong le mekgwatiriso ya rona mme di supa mofuta le popego ya tirisano ya kgwebo.

## Go bua ka kgololesego le go tlhagisa matshwenyego

Mongwe le mongwe wa rona o ikarabelela ka go netefatsa gore re fitlhelela maitlamo a rona. Re lebeletse gore badiri ba rona ba bue ba gololesegile mme re tlhoka gore ba bege matshwenyego ape fela malebana le go tlolwa ga Molao wa Boitshwaro, dipholisi tsa rona kgotsa molao, seno se ka tswa se amana le bone kgotsa ba bangwe. Matshwenyego ano a tshwanetse go tlhagisiwa go batsamaisi, bakaedi kgotsa ka ditsela tsa go bega tse di leng teng, tse di akaretsang ba go ka ikgolaganngwang le bone ba tiro ya bone fela e leng go bereka ka go tlhaba mokgosi kwa diofising tsa rona le dithoto tsa madirelo. Ditsela tsa Porokeramo ya Khampani ya Rona Tsa go Bua Matshwenyego gape di teng go ka dirisiwa ke badiri, borakonteraka le ditlamo tsa kwa ntle. Gape re lebeletse gore badiri ba bege go tlolwa gope fela ga ditlhokego tsa mekgwatsamaiso ya rona.

Glencore e tsaya matshwenyego ka bomasisi mme e berekana le one ka bonako.

Glencore ga e na go itshokela ka gope go ipusolosediwia kgatlhanong le ope fela yo o buang ka kgololesego kaga boitshwaro jo a dumelang gore ga bo a siama, ga bo kafa molaong kgotsa ga bo dumalane le Molao wa rona wa Maitshwaro, dipholisi le mekgwatsamaiso, tota le fa go tshwenyega go sa kgone go tshegediwa ka mabaka. Ga go kitla go nna le go se tshwarwe sentle gope ga ope fela yo o tlhagisang matshwenyego ntle le fa fela ba dirile pego e e fosagetseng ba ntse ba itse.

## Ditlamorago

Dipholisi tsa rona di tshegetsa Melaometho ya rona le Melao ya Boitshwaro mme di supa se se leng botlhokwa mo go rona. Re tsaya go tlolwa ga dipholisi tsa rona ka tsela e e masisi. Go ikaegile ka go etegela ga tlolomolao, ditlamorago di ka simolola ka go tlhagisiwa go ya go go kobiwa mo tirong.



## Mafoko a konokono

**Pipamolomo** – sepe fela sa boleng, se se akaretsang madi kgotsa sengwe se sele se se solegelang molemo, se se sololediwang, se se neelwang, se se lettelelwang, se se kopiwang kgotsa se se amogelwang e le go tlhotlheletsa motho ope fela ka tsela e e sa siamang gore a tseye kgato, gore a seka a tsaya kgato kgotsa tshwetso, go sa kgathalesege gore a motho yoo ke modiredipuso kgotsa motho wa poraegefete.

**Bonweenwee** – tiriso e e maswe ya maatla a o nang le one kgotsa seemo sa gago go iponela mesola.

**Dimpho** – dilwana dipe fela tsa boleng kgotsa tse di solegelang molemo tse di refosanwang ntle le tuelo.

**Boitlosobodutu** – selo le fa e le sefe se se sololediwang kgotsa se se amogelwang mahala - se se akaretsang (mme e seng fela) dij, mesepele, lefelo la bonno, ditiragalo tsa metshameko, ditiro tsa boitlosabodutu kgotsa tsa kamogelo ya baeng.

**Tuelo ya tsamaiso** – tuelo epe fela, go sa kgathalesege e nnye go le kae, ya go itlhaganedisa dilo kgotsa gore o direlw tiro nngwe ya puso e e leng ya gale le gale.

**Modiredipuso** – modiredi, modiri kgotsa moemedi wa puso kgotsa setheo se se laolwang ke puso kgotsa -se e leng sa puso, se se akaretsang:

- modiredi ope fela, modiri kgotsa moemedi ope fela wa bositshaba kgotsa wa setheo sa selegae sa puso
- motho ope fela yo o mo maemong a mofuta ope fela wa peomolao, botsamaisi kgotsa boatlhodi
- modiredi ope fela, modiri kgotsa moemedi wa mokgatlho wa botlhe wa boditshabatshaba o o jaaka United Nations, kgotsa World Bank
- modiredi ope fela, mokaedi, modiri kgotsa moemedi wa kgwebo kgotsa khampani ya puso kgotsa e e laolwang ke puso
- modiredi ope fela kgotsa moemedi wa mokgatlho wa sepolotiki, kgotsa
- ntlhopeng ope fela wa ofisi ya sepolotiki.
- representative of any state-owned or -controlled enterprise or company
- any officer or representative of a political party, or
- any candidate for a political office.



## Ditsompelo tse dingwe

Melaometheo ya Rona

Melao ya Boitshwaro

Pholisi ya go lkgolaganya le Dipolotiki

Kaedi ya go Buisana le Badiredipuso

Ditekanyetso Tsa Dimpho le Boitlosobodutu – Dithoto tsa Bodirelo

Ditekanyetso Tsa Dimpho le Boitlosobodutu – Dipapatso

Mokgwatiriso wa Itse Momphato wa Gago – Dipapatso

Mokgwatiriso wa Itse Momphato wa Gago – Dithoto tsa Bodirelo

Tshekatsheko ya Ditshwanelego ya Molekane wa Boraro le Mokgwatiriso wa Tsamaiso

Mokgwatiriso wa Bomphato le go Kopanngwa ga Dikgwebo le go Rekiwa ga Kgwebo

# Boikaelelo jwa Rona

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**“ Go batla dilo tsa botlhokwa  
ka boikanyegi go tokafatsa  
botshelo jwa letsatsi le letsatsi ”**

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