

GIFTS, HOSPITALITY & DONATIONS POLICY

We recognise that gifts and hospitality can be important in developing business relationships. However, caution should be taken when accepting or providing gifts, hospitality, or donations that could raise suggestions of impropriety or create a position of obligation on the part of the recipient. This Policy aims to provide a guideline to ensure that the company, together with its directors, officers, employees, consultants and contractors, may provide or receive gifts, hospitality and donations in compliance with high standards of integrity and all relevant laws and regulations applicable.

STATEMENT

Scope

This Policy forms a statement of the principles that guide our daily operations and establishes how we expect management, employees, service providers, clients, visitors and company representatives to act in accordance with the law and applicable company policies, procedures and guidelines.

This Policy does not discriminate at any level and applies **equally** to **all** company associates.

Guidelines

Directors, officers, employees, consultants, contractors, and their families will not give or accept gifts, gratuities, donations or entertainment in relation to the company or its business that may conflict with the provisions of this Policy. For clarity, all directors, employees, consultants, and contractors must ensure;

- a. Gifts, hospitality or donations are not given or accepted with the intention or the expectation of influencing a party to obtain or retain business, as a reward for the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- b. Gifts, hospitality, or donations should be customary in the industry.
- c. Gifts, hospitality, or donations should not violate any local laws.
- d. Any gift, hospitality or donation given or received should be in the company's name and not in an individual's name.
- e. The gift or hospitality shall not be in cash or a cash equivalent (e.g. vouchers, gift certificates).
- f. The gift, hospitality or donation shall be of an appropriate type and value and given or accepted at an appropriate time, taking into account the business relationship with the counterparty, any pending action expected of the counterparty and the reason for the gifts or hospitality;

- g. The gift, hospitality or donation should be given or accepted openly and not secretly.
- h. Gifts, hospitality or donations should never be offered or accepted without the prior approval of the Compliance Team, where the value of the gift or the hospitality per person is more than the internal limits.

The above does not cover gifts such as promotional items (e.g. pens, notepads, diaries and calendars) or refreshments offered during a business meeting.

- i. All gifts, hospitality and donations provided, received or declined shall be recorded in the Gifts, Hospitality & Donations Register.

Responsibility

Company management and Masters are accountable for ensuring that the standards set forth by this Policy are communicated and that their conduct sets a good example in this respect.

Violations

Adherence is mandatory, and any violation of this Policy and associated documented procedures may lead to disciplinary action or legal consequences.

Continuous Improvement

Senior management reviews this Policy annually and revises it as necessary to reflect changing operational conditions, new technology, government policies and legislation.

ANNUAL APPROVAL OF CORPORATE POLICIES

Approved by the CEO and Managing Director.

Annual Verification

Date: 17th June 2022

Verification Stamp:



Annual Verification

Date: 3rd April 2023

Verification Stamp:



Annual Verification

Date: 27th March 2024

Verification Stamp:



Annual Verification

Date:

Verification Stamp:

Annual Verification

Date:

Verification Stamp: