

	Gifts and Entertainment Policy	Doc No: EEC-GEP-01 Rev No: V1.0 Issue Date: APR 2022 Revised Date: MMM YYYY
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Purpose

Business gifts and entertainment of reasonable value are commonly used to mark goodwill and strengthen business partners' working relationships. Providing or accepting occasional meals, small company souvenirs, and a ticket to events may be appropriate in certain circumstances; however, if offers of gifts and entertainment are frequent or of substantial value, they may create the appearance of or an actual conflict of interest or illicit payment (including a bribe).

We value our reputation for conducting business ethically and transparently. This policy is designed to ensure compliance with Elite's ethics and core values.

Scope

This procedure applies to all employees of Elite. Any breach of this policy will be treated seriously and will result in disciplinary action, including the termination of employment and the immediate termination of any vendor or business partner arrangements.

Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. Line Managers are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

Guidance

Gifts

As a general rule, Gifts should never be requested or provided. However, we understand that in certain business scenarios, purely for social reasons (and not for obligatory or influencing reasons), there may be situations when accepting/offering gifts is unavoidable.

Examples of Gifts that are not appropriate are gifts:

- Of cash or cash equivalents such as gift cards or gift certificates.
- That is prohibited by law.
- To government officials.
- That is accepted/given in return for a favour.
- Which are accepted/given as bribe/kickback to obtain/retain business, or to secure an improper advantage which could include by way of employment, statutory approvals, orders from clients, etc.; and
- That is paid for a personal capacity to avoid reporting it or seeking relevant approval.

Entertainment

Entertainment may be accepted/provided for legitimate business purposes, such as building goodwill and having relationships with customers, vendors, and business partners.

Examples of Entertainment that are not appropriate are entertainment:

- That can be viewed as excessive in the context of the business occasion.
- That is prohibited by law.
- To government officials.
- "Adult" entertainment or any event involving alcohol, nudity, or lewd behaviour; and

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- The management otherwise prohibits.

When a government entity/employees/officers are involved, the issue of gifts and entertainment may have serious legal implications. You should be aware that gifts and entertainment involving these parties may be perceived as bribes or payoffs. Serious consequences can result from mishandling these relationships. Offering or accepting bribes and payoff is prohibited.

Gifts and Entertainment Limits

Where Gifts and Entertainment are provided/received, it should not be more than **\$50** per person per event.

Any Gifts and Entertainment over the above limits will need prior approval from the HoD. You are expected to apply common sense regarding the exchange of Gifts and Entertainment, bearing in mind potential conflict of interest (e.g. leading to undue influence on decision-making and potentially gaining/giving preferential treatment).

Considerations

Gifts and Entertainment that compromise or even appear to compromise our ability to make objective and fair business decisions are inappropriate. It may be viewed as commercial bribery in severe cases, putting Elite and you at risk. In all cases, business gifts and entertainment must be reasonable and proportionate, given the parties involved, and should never improperly influence or appear to influence Elite's business relationships.

Receiving Gifts/Entertainment:

- Any gifts received will be reported to HR & Compliance for recording.
- If a gift received is prohibited, contact HR & Compliance for guidance on how the gift may be returned, donated, or otherwise handled.

Giving Gifts/Entertainment:

- For client entertainment, expenses should not include alcohol, shisha, etc. The sales team can't invite the same customer/person more than 4 times/year and should have a gap of a minimum of 3 months. A maximum of 2 guests from the same client can be invited simultaneously. Cost should be limited to \$27 per person or less.
- Reasonable gifts given involving public employees/officers should be discussed and pre-approved by the CEO.
- Claiming reimbursements of expenses
 - o Complete the expense claim reimbursement form and get your HoD's approval
 - o Original receipts are to be attached to the expense claim reimbursement form and should mention the name, designation of the customer and the purposes of the meeting.

Reporting Concerns

Where you have concerns about a colleague in connection with the giving or receiving gifts and entertainment, these can be raised by emailing Compliance. You can report in confidence and without fear of retaliation. All concerns raised are taken seriously and, where appropriate, investigated in detail.