

<b>Policy</b>	<b>Gifts and Hospitality Policy</b>
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<b>Purpose</b>	<p>T&amp;G Global is committed to promoting the highest standard of business ethics.</p> <p>This policy provides guidance in relation to the acceptance of gifts and hospitality by employees of T&amp;G Global and assists employees to avoid any perception of impairment of their objectivity or impartiality.</p>
<b>Scope</b>	<p>This is a T&amp;G Global group wide policy, applying to T&amp;G Global Limited (the Company) and all of its majority-owned subsidiaries (together the Group), effective from 19 June 2017.</p>
<b>Definitions</b>	<p><b>Benefits:</b> All advantages which personally favour the recipient and for which there is no legal basis or claim (e.g. gifts, business entertainment, invitations to events or the assumption of costs for travel and accommodation). It includes Gifts and Hospitality.</p> <p><b>Gift:</b> A reward, gratuity or other consideration beyond the expected or required remuneration and/or reimbursement. It may take the form of a tangible object or a benefit, for example, free use of a corporate box at a sporting event or privileged access to goods or services.</p> <p><b>Hospitality:</b> Catering or entertainment.</p> <p><b>Register:</b> The gift and hospitality register maintained by the T&amp;G Risk Manager, on which all offers of Benefits with a value of \$200 or more are required to be recorded.</p>
<b>Procedure</b>	<p><b>1. General Principles</b></p> <ul style="list-style-type: none"> <li>• Benefits are not to be given or accepted where they are in return for a certain behavior.</li> <li>• To avoid perceptions of inappropriate conduct or unfair influence, no employee or contractor should give or accept any Benefit in circumstances where acceptance of the Benefit could in any way influence business decisions (e.g. conclusion or extension of a contract). This also applies where the giver or receiver of the Benefit may be in the position to influence a decision.</li> <li>• Actively requesting or demanding Benefits is strictly forbidden.</li> <li>• All Benefits must be sent to / received by the recipient at their business address.</li> </ul> <p>The above principles are applicable independent of the type or amount of the Benefit.</p> <p><b>2. Business entertainment / invitations / events</b></p> <p>Such Benefits must be linked with a business purpose (an invitation for a private reason is not permitted) and experienced with the business partner. Costs for travel and accommodation associated with such entertainment must always be borne by the Company and depending on the value approved by the respective Executive or CFO (refer to 5. Duty of Disclosure, threshold for approval). Any such Benefit is not to be extended to non-T&amp;G Global employees if not approved by the respective Executive or CFO.</p>

	<p><b>3. Reasonable Benefits</b> Some Benefits may be seen as having low monetary value. Whether a Benefit is reasonable will often need to be determined in the specific context. If the value of a Benefit does not exceed the sum of \$100, then it can generally be assumed that it is a reasonable Benefit.</p> <p><b>4. Money, discounts and Services</b> Money, vouchers convertible to cash as well as discounts which are not customary in the market may not be accepted by employees. Free or excessively low-priced services offered for personal use of benefit cannot be accepted by employees</p> <p><b>5. Duty of Disclosure</b> The acceptance by an employee of any Benefit which exceeds \$100 of value requires the prior approval of the employee’s manager. If it is not possible to obtain prior approval, then this must be done subsequently without delay. Benefits which exceed a value of \$ 200 may only be accepted by employees in exceptional cases. In these cases, the written approval of the employee’s manager must be obtained. Details of that Benefit must be recorded on the Register. Any benefits which exceed a value of \$500 must be reported to and approved by the CFO who will determine if a conflict of interest exists.</p> <p><b>6. Gift and Hospitality Register</b> All offers of Benefits with a value of \$200 or more must be recorded on the Register. Offers of Benefits worth under \$200 are not required to be recorded but employees with concerns about such offers should consult their manager. To enable recording on the Register, the manager of the employee receiving the Benefit must provide the details of the Benefit to the Group Risk Manager, using the form attached as Appendix 1 which should be sent to <a href="mailto:registry@tandg.global">registry@tandg.global</a>. The Register will be presented twice a year for review to the Executive team, and annually to the FRIC. For a better understanding regarding dealing with Benefits, refer to the flow chart attached in Appendix 2.</p>
<b>Authorities</b>	<ul style="list-style-type: none"> <li>• Manager / Executive: Approval of Benefits &gt; \$100 &lt; \$500;</li> <li>• CFO: Approval of Benefits for his direct reports &gt;\$200 and for all Benefits &gt; \$500;</li> <li>• Finance, Risk and Investment Committee (FRIC): Review and Approval of this policy.</li> </ul>
<b>Approval</b>	The policy was approved by the FRIC on 19 June 2017.
<b>Further Information</b>	For further Information please refer to the Group Risk Manager or Company Secretary.

## Appendix 1 : Gift and Hospitality Register Form

Email to registry@tandg.global

Recipient of the gift or hospitality	
Date the gift or hospitality was offered or received	
Donor's name and organization	
Brief description of the reason why the gift or hospitality was offered	
Nature and estimated value of the gift or hospitality	
Name of the manager / Executive who approved the retention of the gift or acceptance of the hospitality.	

To be attached:

Written approval of the Manager / Executive / CFO

## Appendix 2: Gift and Hospitality Process

