



Gift and Hospitality Policy

T&G Global is committed to promoting the highest standard of business ethics.

This Policy provides guidance in relation to the acceptance of gifts and hospitality by employees of T&G and assists employees to avoid any perception of impairment of their objectivity or impartiality.

Scope

This Policy is a group-wide policy and shall apply to T&G Global Limited and its majority owned or controlled subsidiaries (together T&G), effective from 19 June 2017.

Definitions

Benefits: 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.

Gift: 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.

Hospitality: Catering or entertainment.

Register: The Gift and Hospitality Register maintained by the T&G risk team, on which all offers of Benefits / Hospitalities with a value of \$200 or more are required to be recorded.

Principles and Procedure

General Principles

- Benefits are not to be given or accepted where they are in return for a certain behavior.
- 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.
- Actively requesting or demanding Benefits is strictly forbidden.
- All Benefits must be sent to / received by the recipient at their business address.

The above principles are applicable independent of the type or amount of the Benefit.

Business entertainment / invitations / events

- Benefits must be linked to 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 should always be borne by the Company unless specifically approved by the respective Executive or CEO.
- Benefits are not to be extended to non-T&G employees (e.g. partners) if not approved by the respective Executive or CEO.

Reasonable Benefits

Some Benefits may be seen as having low monetary value and whether a Benefit is reasonable will often need to be determined in the specific context.

Benefits with a value not exceeding \$100 can generally be assessed as reasonable Benefits.

Money, Discounts and Services

Money, vouchers convertible to cash and 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

Duty of Disclosure

- Benefits exceeding \$100 in value require 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 exceeding \$200 in value may only be accepted in exceptional cases and with written approval by the employee's manager. Details of that Benefit must be recorded on the Register.
- Any benefits exceeding a value of \$500 must be reported to and approved by the respective Executive (for Executives by the CEO) who will determine if a conflict of interest exists. Details of that Benefit must be recorded on the Register.
- Benefits given to the CEO and exceeding a value of \$200 require the approval by the CFO and must be recorded on the Register.

Gifts and Hospitality Register

All Benefits exceeding \$200 in value must be recorded on the Gift and Hospitality Register by sending the following details of the Benefit to risk@tandg.global:

- Details of the Benefit e.g. invite, value of the benefit, extension of the invite to the partner etc.;
- Manager / executive / CEO approval.

The Register is kept confidential and will be presented to the Finance, Risk and Investment Committee (FRIC) twice a year for review.

For a better understanding of the process refer to the flow chart attached in Appendix 1.

Authorities and Approval

- Manager: Approval of Benefits > \$100 < \$200;
- Executives: Approval of Benefits for their direct reports >\$200 and for all Benefits > \$500;
- CEO: Approval of Benefits for Executives >\$200
- T&G Board of Directors: Approval of this Policy.

This Policy was approved by the FRIC on 19 June 2017, with the updated Policy reviewed and approved by the T&G Board of Directors on 18 September 2020.

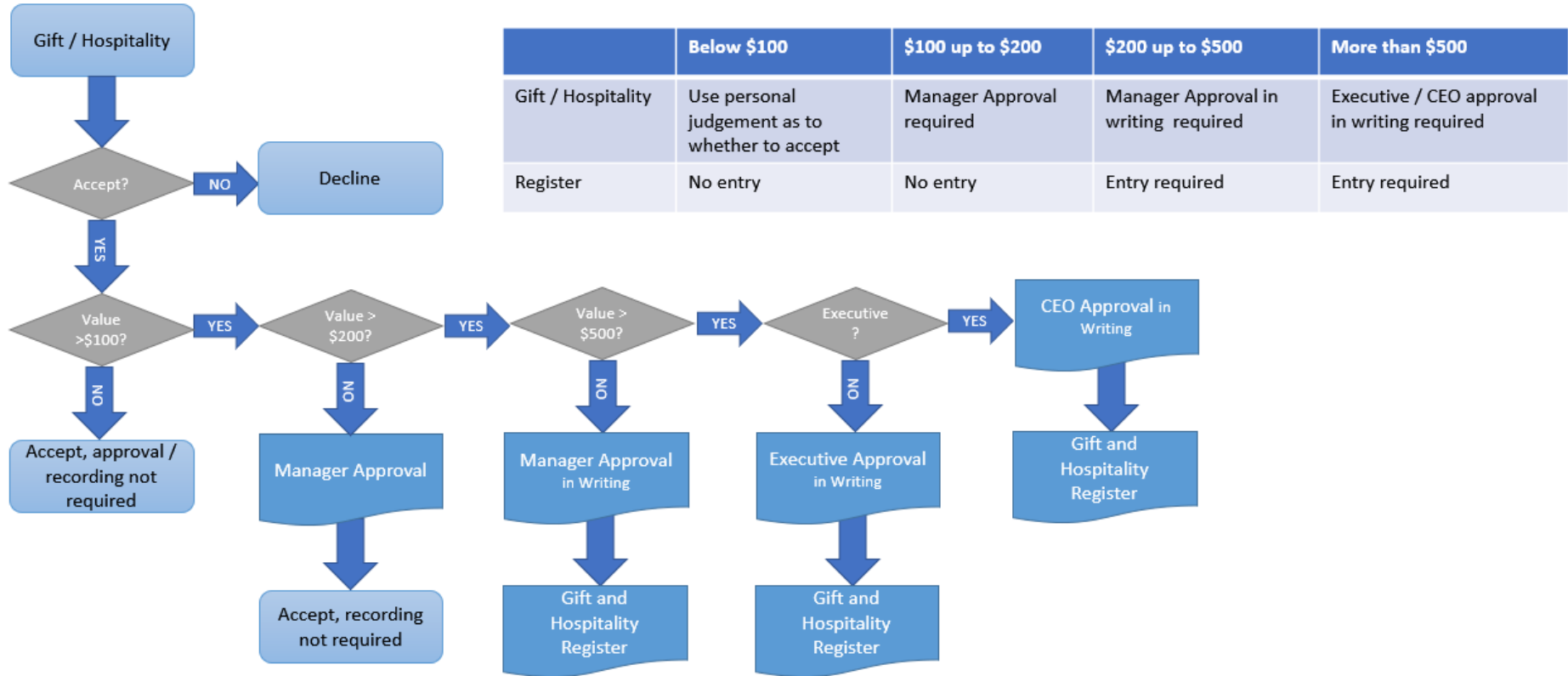
Further Information

For further information please refer to the Head of Risk and Compliance.

Policy Updates

Date	Name	Update Made
Bianca Verbeek	19 June 2017	Development of this Policy
Bianca Verbeek	18 September 2020	Addition of CEO benefits procedure

Appendix 1: Gift and Hospitality Process



Policy Owner: Head of Risk and Compliance

Issue Date: June 2017
Review: September 2020

Next Review Date: 2023