

4 THE COMPANY AND ITS SUPPLIERS, CONTRACTORS, CUSTOMERS AND PEERS *continued*

4.2 GIFTS, HOSPITALITY AND FAVOURS

Employees should not accept any gift, hospitality or favours from suppliers, contractors or purchaser of goods or services. However, acceptance of the following would not be considered contrary to this policy:

- (a) Advertising matter of a nominal commercial value;
- (b) Occasional business entertainment such as lunches, cocktail parties or dinners which are necessary to promote or expedite business matters are acceptable. Caution should however be exercised to ensure that such lunches do not become a regular occurrence with selected suppliers or that the impression is given that such lunches are a requirement for doing business.

Prior permission must be obtained from the employees functional head of department before accepting an invitation to attend any of the above, and the relevant details must be entered in the gifts and entertainment register which is kept by the functional head of department.

- (c) Occasional personal hospitality such as tickets to local sporting events or theatres, provided that the cost of any accommodation and transport is borne by the recipient.

Prior permission must be obtained from the employees' functional head of department to attend a function or accept tickets to the theatre or to sporting events, provided that the cost of any transport, air tickets or accommodation is borne by the employee. The request for permission must be done in writing and clearly state the purpose of the function. In addition the relevant details must be entered in the gifts and entertainment register which is kept by the functional head of department.

Transport provided by a contractor or supplier from a central place to transport their customers to and from a stadium is acceptable. Participation in sponsored sporting events is acceptable.

4.3 BRIBES AND/OR PERSONAL GAIN

All large and expensive gifts are regarded as bribes. Examples of these are amongst others, TV sets, refrigerators, sponsored holidays including weekend trips such as fishing and hunting trips, flight tickets and cases of liquor. Such gifts may not, under any circumstances be accepted by employees from any supplier, even if an employee has paid a portion of the cost. Offers of this kind must be firmly declined or immediately returned to the sender.

Employees are in no way to be involved in the authorisation of or giving effect to any transaction in which they or any member of their families could gain, whether financially or otherwise in a transaction involving the company, either directly or indirectly.

Employees are also precluded from giving or taking steps to acquire or to give gifts or money of any value from or to a supplier, customer, employee or agent of any entity with which the company does business which could or may influence or which could give the appearance of being capable of influencing the actions of suppliers, customers, clients or entities with which the company does business, including their employees and their agents.

Employees have a duty to report any approach made to them or of which they are aware, by any person seeking favour or preference in any respect concerning the company on the basis of offering any form of inducement to any person having an influence in the company.