

12.31 Gift and Entertainment Policy

12.31.1 Purpose

12.31.1.1

This document outlines the Policy on gifts and entertainment and what is considered to be appropriate conduct when employees are faced with situations in the work place that involve providing or receiving gifts or entertainment.

12.31.2 Applicability

12.31.2.1

The Policy applies to every Employee and Director of the Air-Tec Group that includes its subsidiaries. Violations of this Policy may lead to disciplinary action, up to and including termination of employment.

12.31.3 Elaboration

12.31.3.1

Gifts and entertainment should never be offered or accepted with the intention to influence – or appear to influence – business decisions or relationships in any way.

12.31.3.2

Gifts and entertainment, offered or received, will only be acceptable if they are:

- Reasonable
- Appropriate
- Legal
- Not intended to influence

12.31.3.3

The definition of gifts includes (but are not limited to):

- Cultural courtesies
- Business gifts
- Travel or accommodation associated with a business conference, meeting or event
- Business meals and refreshments
- Tickets to sports, music or cultural events

12.31.3.4

The Air-Tec Group that includes its subsidiaries is committed to the highest standards of ethical conduct as set forth in the Companies Code of Ethics that is based on the Code of Corporate Governance for Mauritius (2016)

12.31.3.5

Unless otherwise expressly permitted, gifts and entertainment may only be offered to individuals with whom the Company has a business relationship, excluding spouses, family members, or friends of such individuals.

12.31.3.6

Employees may receive gifts or entertainment from business partners but they should always be reasonable, never lavish and must not give the impression that the gift or entertainment is intended to influence. If it may be considered generous by an onlooker you should politely refuse.

12.31.3.7

If a gift with a fair market value (based on what a knowledgeable, willing, and unpressured buyer would probably pay to a knowledgeable, willing, and unpressured seller in the market) that exceeds \$50 is offered to an employee, it is the responsibility of the employee to ensure that the gift is recorded in the gift register.

12.31.3.8

It should be noted that gifts that have been refused by an employee, considering the conditions noted above, should also be recorded in the gift register.

12.31.3.9

No gifts should in any circumstance be offered or received from Government officials of any Country.

12.31.3.10

The process below sets out the steps to be taken when gifts are received or provided to third parties:

12.31.3.11 Receiving of gifts

Step 1: In the event that a gift is received, based on your sound judgement, consider if the gift you are receiving is lavish in nature.

Step 2: If the answer to step 1 is YES, kindly turn down the gift by explaining to the third party that the Company policies you are bound by, does not allow for you to accept gifts from third parties AND declare the refused gift in the Company's gift register as kept by the Group Corporate Governance Risk and Compliance Officer.

Step 3: If the answer to step 1 is NO, determine the fair market value of the gift and if this value exceeds \$50, accept the gift and declare the gift in the Company's gift register as kept by the Group Corporate Governance Risk and Compliance Officer.

Step 4: If the answer to step 1 is NO, determine the fair market value of the gift and if this value does NOT exceed \$50, accept the gift and recording this in the gift register is not required.

12.31.3.12 Providing of gifts

Step 1: If the gift exceeds the value of \$200, pre-approval by the CEO and/or ED and GFD should be obtained and details of this gift should be recorded in the gift register.

Step 2: If the gift does not exceed the value of \$200, approval to purchase the gift should be obtained as per the financial matrix however recording of the gift in the gift register is not required.