



Boustead

NO GIFT POLICY

Boustead Group expects all employees to act with the highest standards of honesty and ethical conduct in fulfilling their duties and responsibilities. All employees must diligently observe and comply with all relevant laws and regulations. Any breach of such principles or any offence committed against the Group's interest is viewed seriously by the Group which will result in appropriate disciplinary action up to and including legal action, where applicable.

This Policy is intended to provide guidance to all employees of the Group who, in the course of their day to day work or as a result of their employment, provide or receive offers of **gifts, entertainment and hospitality**. It is essential to ensure that their duties are carried out impartially and with integrity. In performing duties, employees shall act within the boundaries of their job responsibility.

In line with the above commitment, the Group has adopted a No Gift Policy effective 1st December 2019 governing the accepting and providing gifts, entertainment and hospitality directly or indirectly. The purpose of this No Gift Policy is to avoid the conflicts of interest and demonstrate the Group's commitment to provide equal treatment to all individuals involved in business dealings with the Group as exchanging gifts, entertainment and hospitality can be construed as bribery and may adversely affect the Group's credibility. The acceptance of gifts, entertainment and hospitality can leave the Group vulnerable to accusations of partiality, deceit or even unlawful conduct.