

## Gift and Hospitality Policy

**This Policy applies to ECM Libra Group Berhad (the “Company”), all its subsidiaries and jointly-controlled joint venture companies with Plato Capital Pte. Ltd. group of companies (collectively referred to as the “Group”)**

### 1. Introduction

- 1.1 Gratification can sometimes be disguised as gifts or hospitality, or gifts or hospitality can be misinterpreted as bribes. Hospitality would include meals and entertainment;
- 1.2 The Group must ensure that the giving and receiving of gifts or hospitality will not distort its business relationships, create a conflict of interest or be construed as gratification;
- 1.3 Conflict of interests may arise by the giving or receiving of favours or special treatment to which no financial value can be attached. Such special treatment can encourage a ‘payback’ expectation and can distort a professional relationship;
- 1.4 The Group recognizes that customary business or cultural occasions do involve the giving of gifts and extension of hospitality particularly during festive seasons and commemorative occasions. The giving of gifts and/or hospitality is practiced then and at times it is not possible or even offensive to refuse the gift or hospitality; and
- 1.5 Gifts/hospitality received or given must not carry any corrupt or criminal intent and must not be perceived to give rise to any effect on actions or decisions. It must also not carry any expectation of any specific favour or improper advantage from the intended recipients.

This policy clarifies the circumstances where gifts/hospitality may be accepted or given and must be read together with the Group’s Anti-Bribery and Corruption Policy (“**ABC Policy**”). If there is any inconsistency, the ABC Policy prevails.

### 2. Receipt of gifts/hospitality

- 2.1 The receipt of gifts/hospitality must be in an open and transparent manner and must not be solicited;
- 2.2 Employees should not accept gifts/hospitality or any other consideration from any person having business relationship with the Group unless all the conditions in clause 4.1.2 of the ABC Policy are satisfied. If a gift is received without a reasonable opportunity to decline it, it must be declared in accordance with paragraph 2.3 of this policy and obtain the permission of the Compliance Officer and the respective Head of Department based at HQ Bangunan ECM Libra or in his/her absence, the Group Chief Executive Officer;

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- 2.3 All gifts will have to be reported via the **Gift Declaration Form** within 5 working days of the receipt to the Compliance Officer and the respective Head of Department. All gifts from anonymous or unknown givers are to be reported. The Compliance Officer shall have the liberty to determine the disbursement of such gifts;
- 2.4 Acceptance of hospitality should be exercised with discretion. Excessively generous hospitality given to any one individual and/or his personal associates may be liable to misinterpretation;
- 2.5 Hospitality given to any employee of the Group by clients or investee companies, while the employee is carrying out his duties or by virtue of his/her position in the client/investee company's organisation (e.g. as director or corporate representative of the Groups' investment in the investee company) and where the hospitality is enjoyed without discrimination may be accepted;
- 2.6 Corporate gifts of modest value bearing the logo or brand of the giver, hereinafter defined as branded goods (e.g. pens, mugs, diaries, calendars, mousepads, baseball caps, t-shirts, key chains, bags, etc) whether given personally or received, may be retained unless these are regarded as inducement or reward;
- 2.7 Gifts, food or festive hampers given in celebration of festive seasons are to be declared. Where the gift hampers are of excessive value or contains luxury items, such hampers are to be returned with a note;
- 2.8 Items given out openly in fairs, trade events, conference, media event, annual general meeting, etc, where the item is given out without discrimination and not exclusively to any one particular employee may be accepted;
- 2.9 Gift certificates, discount coupons, cash vouchers or equivalent received as part of external parties, client's/investee company's promotional or family days, regardless of value, must be declared and surrendered in full to the Compliance Officer, and a **Gift Declaration Form** be completed and submitted to the Compliance Officer and the respective Head of Department. The Compliance Officer shall have the liberty to determine the treatment and/or disbursement of such gifts; and
- 2.10 If employees are invited to attend a meeting, present a speech or paper or submit a written article in any associations, societies, foundations or commercial conference, all speaking fees, article fees and honoraria should be declared and should be paid over to the Group, who has the discretion to allow the employee to retain the sum.

### **3. Giving of Gifts/Hospitality**

The provision of gifts/hospitality from the Group is permitted as follows:

- 3.1 The Group does not regularly make charitable donations to organisations. Should a payment to a charitable organisation or education fund be made, the prior approval of the Board of the Company is required. A donation or payment must never be made to the order of any individual. All such solicitations must be made by such organisations under their official letterhead;
- 3.2 Corporate gifts given to other commercial organisations or individuals in relation to the Group's official functions, events, celebrations, conferences, seminars, trainings, workshops, exhibitions (in the form of commemorative branded goods or door gifts) offered to all guests or employees attending the event;
- 3.3 Exchange of gifts at company-to-company level. Thereafter the gift is treated as the Group's property;
- 3.4 Gifts to employees and/or their relative in relation to employee events or company celebrations, e.g. performance rewards, long-service awards, competition prizes etc;
- 3.5 Sponsorships of education fund, sports event, anniversary celebrations, milestone events, office/factory openings would require the prior approval of the Board of the Company; and
- 3.6 Client/Investee company' staff dinners, up to an amount of RM1,000 in any one year, in the form of gift vouchers or tangible goods or payment, made out to the client/investee company.

### **4. The Compliance Officer**

Contact details of the Compliance Officer are as follows:

Title: Group Head, People & Culture  
Tel No.: 03-2632 9805  
Email: people.hq@ormondhotels.com