



GROUP HUMAN RESOURCE

Policies & Procedures for Gifts and Hospitality

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Revision No.	: 0	Issued Date	: 1 AUGUST 2022

1.0 INTRODUCTION

The provision and receipt of gifts and hospitality of a reasonable value are common for legitimate business purpose in building goodwill and business relationships. However, gifts and hospitality can potentially be abused and could amount to bribery and corruption.

2.0 OBJECTIVE

This policy is to:

- a) set out our responsibilities and the responsibilities of those working for Tropicana in observing and upholding our stance against bribery and corruption when giving and receiving gifts and hospitality; and
- b) to provide information and guidance to those working for us on how to recognize bribery and corruption issues when giving and receiving gifts and hospitality and the procedures for dealing with such issues.

This policy should be read in conjunction with Tropicana's Code of Conduct and Tropicana's Anti-Bribery and Corruption Policy.

3.0 SCOPE

This policy applies to all Employees and Directors of Tropicana Corporation Berhad and its Group of companies wherever located.

4.0 REFERENCE

- 4.1 Gift Declaration Form (GDF)

5.0 DEFINITION

- 5.1 Below is the list of terminologies and abbreviation of words that are used in this SOP:

5.1.1 Company	Tropicana Corporation Berhad and its group of companies
5.1.2 HOD	Head of Department
5.1.3 HGHR	Head of Group Human Resource
5.1.4 GHR	Group Human Resource, a division of the Company that is focused on activities related to employee(s).
5.1.5 Gifts	Comprise of cash, free fares, shares, lottery tickets, travelling facilities, entertainment expenses, services, club memberships, any form of commissions, hampers, jewelries, decorative items and any item of high value that is given to any person or organization without any expectation of anything in return or without any intention to influence someone to act inappropriately
5.1.6 Hospitality	Includes the following advantages that may be given to any person or organization including their family members and business partners: a) entertainment (such as golf activities etc.); b) meals and drinks; c) travel and/or accommodation (whether or not packaged with conferences, seminars, study trips or other benefits).
5.1.7 Third Party	Includes anyone who at any time performs (or who is intended to perform) services for or on behalf of any entity in Tropicana including anyone who is engaged (by contract or otherwise) or paid to represent any entity in Tropicana such as suppliers, distributors, business contacts, agents, representatives, intermediaries, middlemen, introducers, sponsors, consultants, contractors, and advisers.

6.0 RESPONSIBILITY

6.1 All Employees and Directors are required, as part of their normal duties, to do the following:

- familiarize themselves with and comply with the Policy and related policies issued by Tropicana as updated from time to time;
- participate in relevant trainings or briefings provided by Tropicana;
- Immediately report any instances of Gift and Hospitality which are an actual or suspected bribe, any allegations of the same made or offered or breaches of relevant policies and procedures which come to their attention in accordance with the Whistleblowing Policy.

All queries regarding this policy's interpretation and when and how the rules can apply in any given situation should be directed to Group Human Resource.

7.0 PROCEDURE

7.1 Tropicana acknowledges that the exchange of gifts and/or hospitality is a central part of business etiquette.

7.2 Thus employees and directors are expected to exercise proper judgement in handling gift and hospitality activities taking into consideration the following principles:

- Conscientiously maintain the **highest degree of integrity**;
- Always exercise **proper care and judgement**;
- Avoid **conflicts of interest**;
- Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of Tropicana; and
- Comply with the applicable laws, regulations and Tropicana policies and procedures.

7.3 The giving and receiving of gifts and hospitality is permitted based on the following conditions:

- is not given or received with the intention of influencing anyone, whether improperly or otherwise, in order to obtain or retain business or a business advantage, or to improperly reward the provision or retention of business or a business advantage;
- when given, is given in Tropicana's name and not in an individual's name;
- the value of the gift or hospitality is of a relatively small value i.e., <RM 500 and frequency is given or received at an appropriate time (taking into account the reason for the gift).
- is reasonably and legitimately related to the nature of the business relationship and is given or received openly.

7.4 Employees and directors are required to complete the GDF which is provided by Group Human Resource for submission to Head of Department who will then decide whether to approve the acceptance of the gift or require it to be returned.

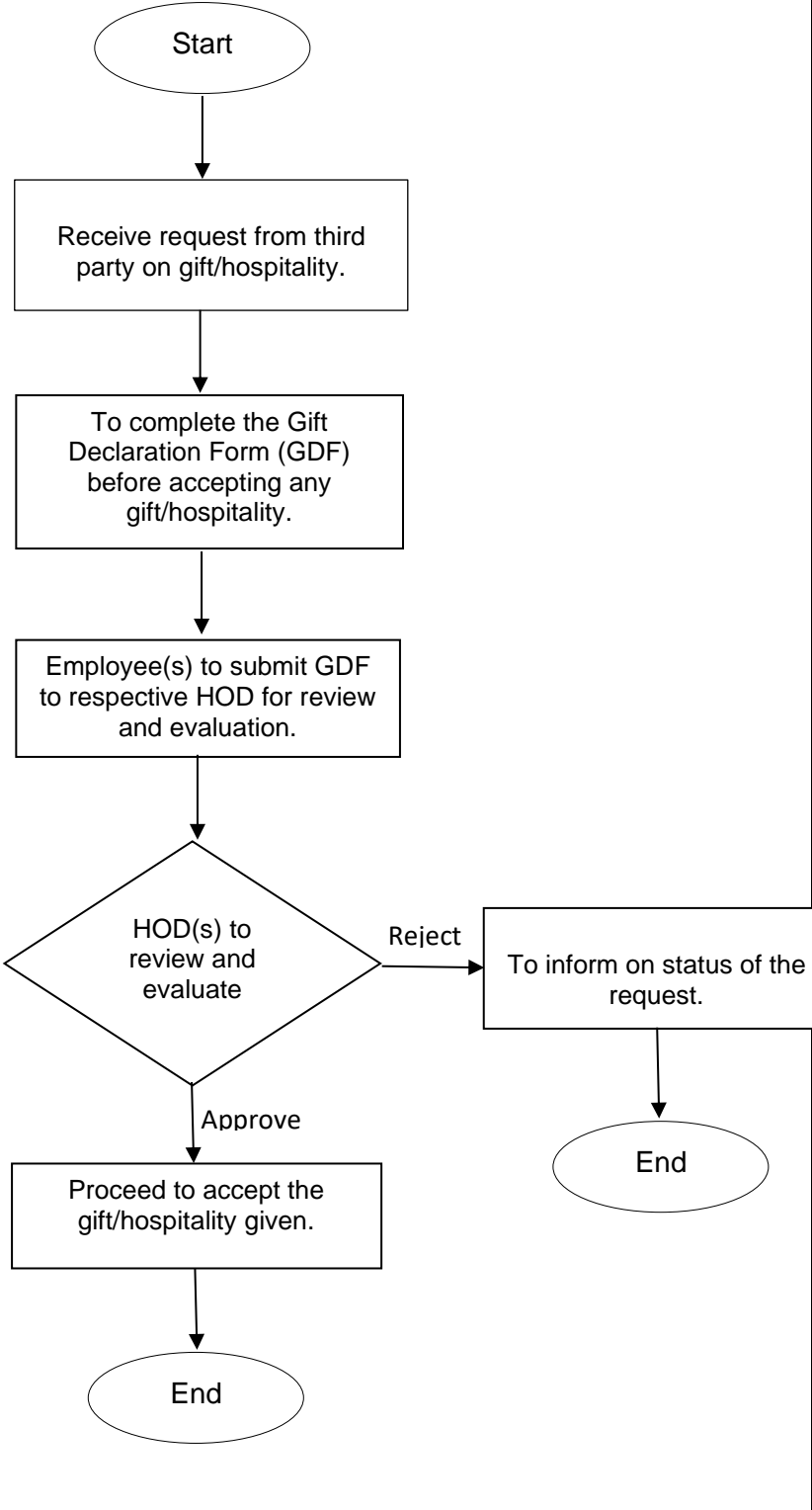
7.5 In the event the Head of Department approves the acceptance of the gift, he/she must also determine the treatment of the gift whether to:

- a) Donate the gift to charity; or
- b) Hold it for department display; or
- c) Share with other employees in the department; or
- d) Permit it to be retained by the employee.

7.6 The compilation of GDF should be performed by respective Head of Department for submission to Group Human Resource on a quarterly basis.

8.0 Non-Compliance

Failure to comply with this policy and procedures is subject to disciplinary action which includes termination of employment.

ACTIVITY	RESPONSIBILITY	REFERENCE
 <pre> graph TD Start([Start]) --> Step1[Receive request from third party on gift/hospitality.] Step1 --> Step2[To complete the Gift Declaration Form (GDF) before accepting any gift/hospitality.] Step2 --> Step3[Employee(s) to submit GDF to respective HOD for review and evaluation.] Step3 --> Decision{HOD(s) to review and evaluate} Decision -- Reject --> Step4[To inform on status of the request.] Decision -- Approve --> Step5[Proceed to accept the gift/hospitality given.] Step4 --> End1([End]) Step5 --> End2([End]) </pre> <p><i>Remarks: HOD(s) to compile all gift/hospitality request and submit to GHR on a quarterly basis.</i></p>	<p>Employee</p> <p>Employee</p> <p>Employee, HOD</p> <p>HOD, Employee</p> <p>HOD, GHR</p>	<p>GDF</p> <p>GDF</p>

Appendix A

GIFT DECLARATION FORM

To be completed by the recipient of the reportable gift and obtain approval from Head of Department before the gift being received.

RECIPIENT'S DETAILS	
Name (as per NRIC)	:
Staff ID	:
Designation	:
Company / Department	:
Date of Gift Received	:

OFFERED BY							
Name (as per NRIC)	:						
NRIC	:						
Designation	:						
Company Name	:						
Relationship between Company and Tropicana Corporation Berhad and its group of companies	:						
Reason for gift <i>(Attached photo if applicable)</i>	:						
Value of gift (Estimated)	:						
Would accepting the gift: a. Create any or perceived conflict of interest? b. Bring you, the Company or the board into disrepute?	<table style="width: 100%; border: none;"> <tr> <td style="text-align: center; width: 15%;"><input type="checkbox"/> Yes</td> <td style="text-align: center; width: 15%;"><input type="checkbox"/> No</td> <td style="width: 60%;">Please state if yes:</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> Yes</td> <td style="text-align: center;"><input type="checkbox"/> No</td> <td>Please state if yes:</td> </tr> </table>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Please state if yes:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Please state if yes:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Please state if yes:					
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Please state if yes:					

DECISION REGARDING GIFT			
<input type="checkbox"/> Accepted	<input type="checkbox"/> Declined	<input type="checkbox"/> Other(s):	
Signed by Recipient:	Approved by Head of Department:	Received by GHR:	Acknowledged by GIA:
_____	_____	_____	_____
Name:	Name:	Name:	Name:
Date:	Date:	Date:	Date: