

GIFT & HOSPITALITY POLICY

This Policy sets out the requirements for giving and receiving gifts and hospitality by internal employee and external parties¹ across **Al Dhafra Recycling Industries** and its stakeholders.

This Policy applies to all employees of the organization, third parties engaged by the organization, and all alliances and joint ventures in all jurisdictions.

The objectives of this Policy are that gifts and hospitality must:

- ❖ be for a legitimate business purpose;
- ❖ be reasonable in terms of cumulative value and frequency; and
- ❖ not create a sense of obligation or inappropriate relationship, capable of unduly influencing business decisions.

All employees are required to exercise due care and judgement in determining what is occasional, proportionate and modest, when offering or accepting gifts and hospitality in order to protect themselves and the organization against allegations of improper behaviour, conflict of interest or bribery.

1. What Gifts or Hospitality can be Accepted or Offered?

If an employee is offered a gift or any hospitality, or wishes to give a gift or issue an invitation to any hospitality, they should follow these steps:

Step 1: Is the item or event for a **legitimate business purpose**?
If no, the gift or hospitality must not be accepted or offered.

Step 2: Is it otherwise prohibited (as set out in clause 4)?
If yes, the gift or hospitality must not be accepted or offered.

Step 3: Where does the gift or hospitality appear on Table 1?

Table 1: Schedule of Amounts for Gifts and Hospitality

Item / Event	Amount AED (per person)	Requirement to record	to Obtain prior approval	
Gifts or Hospitality offered or received (lunch, dinner, farewell or Christmas function or sporting event / concert / benefit, flights, accommodation)	To Employees ²	Any amount	YES	
	Public Officials	Any amount	YES (from GM ³)	
	Other (Incl. clients and business partners)	<300	No	
		300 to 1000	YES	
	>1000	YES	YES (GM or manager) ⁴	
Employee engagement of organization's suppliers (e.g., consultants, contractor) for a non-business related purpose ⁵	Any amount	YES		



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1. Gifts and hospitality through an intermediary will be treated as given or received directly by a principal.
2. From a member of the organization internally.
3. The most senior employee at the event or arranging the gift or invitation is responsible for lodging the Form. And submit the Forms to the Al Dhafra Recycling Industries GM.
4. The more senior of the two. If a manager receives a request relating to a gift or hospitality that they are a part to and/or are participating in, they must refer the Form to their manager for approval.
5. In line with the Al Dhafra Recycling Industries Code of Ethics, you must ensure your personal activities and interests do not conflict with your responsibilities to the organization. It is important to avoid even the appearance of a conflict of interest.

Record only - If Table 1 requires the gift or hospitality to be recorded but does not require approval, it may be accepted, and the Employee must promptly **complete the relevant parts of the Gifts Approval Form** so the General Manager will be notified and Gift Register updated.

Record and Approval - If Table 1 requires the gift or hospitality to be recorded and requires approval the Employee must:

- Seek prior approval as per Table 1, Submit the Gifts Approval Form, for the online approval, and
 - **If Approved**, Requester will be notified, and Gift Register update
 - **If Rejected**, Requester will be notified, and Gift Register updated. This request will be reported closed.

Where gifts or hospitality are received unexpectedly, and prior notification or approval is not able to be sought (such as a meal following a work meeting or a golf game), it must be recorded (and/or approved if required) within 7 days.

Concerns or questions should be raised with top management or sent to the company email info@adri.ae.

2. Gift Register

An online Gift Register is generated by the submission(s) of the online Forms which records details of gifts and hospitality given and received and will be maintained by Top Management.

The Gift Register records the details for regular inspection by management; any irregularity will be reported to GM's office.

Entries in the Gift Register may be used by management for any purpose including in relation to accessing any aspect of an Employee's conduct or any complaint pursuant the ADRI Code of Ethics.

3. Exemptions

This Policy does not apply to:

- Token gifts valued under AED300 to acknowledge outstanding employee performance or employee recognition (such as pens, coffee mugs, project related souvenirs).
- Reasonable meals during business meetings as part of a work activity.
- Reasonable meals provided to an employee as a speaker or presenter at an industry function.
- Recognition items received from third party organisations in a business context, such as plaques, certificates, photographs, or models. Similar items given by the organization are not exempt from this Policy.

4. Prohibited gifts or hospitality

The following **are prohibited** gifts or hospitality:

- Cash or gift vouchers or equivalents;
- Gifts or hospitality given or received with the intention of unduly influencing business decisions;
- Hospitality of an inappropriate nature or at inappropriate venues;
- Gifts or hospitality in exchange for business services or information, loans, cash or Product/service discounts not available to all Employees;
- Facilitation payments, even where allowed under local jurisdictional laws or business practice;
- Gifts of travel or accommodation, including if undertaken during a period of leave. If there is a valid business reason for an Employee to attend an event or function, the organization will pay (subject to appropriate approval) for the travel and accommodation costs of its Employees.

A gift or hospitality is not for a legitimate business purpose if it might reasonably be considered to impair objective judgement, improperly influence a decision or create a sense of obligation. The risk is that the item could be perceived as a bribe, or lead to fraudulent or corrupt behaviour, as outlined in the Al Dhafra Recycling Industries Code of Conduct.

5. Declining a Gift or Hospitality

The organization does not expect individuals to be disrespectful to the persons making offers of a gift or invitation. Employees should respectfully explain this Policy to vendors, suppliers, partners and contractors.

If an excessive gift or inappropriate invitation is received the Employee must:

1. Decline and return the item with a tactful yet clear explanation that accepting the gift or invitation is in breach of ADRI Code of Ethics and this Policy.
2. Notify the offer and submit the Online Gifts Approval Form with commentary explaining the situation where appropriate.



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If the person providing the gift requests that the item be donated to a charity of choice, the Employee should contact top management.

At times, clients, suppliers, contractors and other business partners may express an interest in entertainment that involves inappropriate content or excessive cost. This can bring the ADRI brand into disrepute. Employees are unable to participate if the conduct is in breach of the Code. If this situation arises, the Employee must explain tactfully that the organization does not permit company time or funds to be used for entertainment that is excessive in value, sexually explicit, or otherwise inappropriate. The Employee should not try to solve the problem by offering to pay for it personally.

Talal Tabbakh
General Manager