



GIFT AND HOSPITALITY POLICY





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Purpose

This Policy provides for an acceptable value and type of Gift and Hospitality that can be accepted or offered, along with a dedicated reporting framework.

In line with the spirit of the Code of Ethics, the Policy reflects ER's commitment to combating corruption and preventing any actions that may tarnish the reputation of the Group.

This Policy must be read in conjunction with the Code of Ethics.

Guiding Principles

While it is acknowledged that the exchange of Gifts and Hospitality is a common practice in business, all Employees must exercise caution.

It is essential that such exchanges do not compromise, or appear to compromise, the Employee's integrity, impartiality, or independence.

Employees must ensure that any Gift or Hospitality offered or accepted:

- is appropriate in nature and value;
- serves a legitimate business purpose;
- cannot be perceived as a form of inducement or reward.

Financial or non-financial Gifts or Hospitality intended to influence decision-making, or offered as a reward for engaging in illegal or unethical conduct for the benefit of the giver, are strictly prohibited and shall not be accepted under any circumstances.

To whom do the Policy apply?

This Policy applies to ER Group Limited, its Associated Companies (hereafter referred to as 'ER Group') that have adopted ER Group's compliance framework, and their Employees (including Directors and Officers).

Definition and Interpretation

In this document:

1. words denoting the singular number shall include the plural and vice versa;
2. any reference to one gender shall include the other gender; and
3. 'we' or 'our' refer to ER Group or the company.



For the purposes of this Policy, the following words shall have the following meanings:

Associated Company means any company related to, or associate of, ER Group Limited and "related" shall be construed in accordance with the Companies Act 2001 while "associate" shall mean those companies disclosed as associates in the audited financial statements of ER Group Limited.

Company means ER Group Limited or an Associated Company to which this Policy applies.

Conflict of Interest arises when an individual's personal interests — whether financial, professional, or relational — interfere, or appear to interfere, with their duty to act in the best interests of the Group or the Company.

Corruption in the context of this Policy, refers to the offering, giving, receiving, or soliciting of any Gift, Hospitality, or other benefit—whether of monetary or non-monetary value—with the intent to influence a person's decision-making, secure an unfair business advantage, or induce improper conduct.

Courtesy Gift refers to a token of appreciation or goodwill that is modest in value and typically branded with the logo or name of a company. Examples include promotional items such as chocolates, stationery, diaries, pens, mugs, or other small giveaways.

Employee means any person hired by a Company and working full time, part time or on a casual basis, including interns and contracted staff, as well as their management, including directors.

Gift means any object or benefit for which the recipient does not pay.

Hospitality relates to any occasion, event or service where an individual or entity providing the benefit is present and participates.

Third Party: refers to a business partner, supplier, consultant, contractor, sub-contractor, visitor or client and any other individual or entity with whom the Company has business interactions.

Employee means any worker within ER Group or the Company and includes all categories of employees and workers employed on an indeterminate or determinate duration, including full-time, part-time, casual workers and trainees under an apprenticeship, traineeship/training scheme.

ER Group or Group means ER Group Limited and its Associated Companies.



What does ER Group's Code of Ethics state about gifts and hospitality?

- We do not accept gifts or entertainment if we believe they may impair our professional judgment.
- We do not offer gifts or entertainment if it could lead to us obtaining an unfair business advantage. We never offer cash or cash equivalents as gifts.
- We disclose and keep track of gifts being received or offered.
- We refuse questionable or unlawful behaviours such as fraud, corruption and bribery.
- We do business in a manner that neither compromise our company's reputation nor our personal integrity.

Access link to ER Group Code of Ethics: www.ergroup.mu

Acknowledging receipts

As a governing principle, any Gift which is equal or inferior to **MUR 2,000** in term of monetary value, or a Courtesy Gift, can be accepted, subject to the following conditions:

1. The Employee must declare such Gift or Hospitality to the person in charge for Compliance in the Company or the Group Compliance Function, with such required information as provided in the Gift & Hospitality Register;
2. Gift and Hospitality should not be intended to induce the Employee to misuse his position within the Company or the Group in order to wrongfully direct business to the remitter or to otherwise obtain preferential or favourable treatment;
3. Any occurrence with sufficient ground to cause or leading to an unfair and unethical business conduct must be immediately reported (please refer to the Group Whistleblowing Policy) for such relevant actions to be taken; and
4. The Employee shall not accept to receive multiple Gifts and Hospitality (even with a value lower than MUR 2,000 (or equivalent)) from the same Third Party in a short period of time. In such a case, the Employee shall declare such repeating Gift or Hospitality to the person in charge for Compliance in the Company or the Group Compliance Function, with such required information as provided in the Gift & Hospitality Register.

No Employee shall be accepting a Gift or Hospitality from a Third Party if the expected total value exceeds MUR 2,000 or its equivalent in a local currency.

The Employee shall report any such tentative offer to the person in charge of compliance or the Group Compliance Function, with such required information as



provided in the Gift & Hospitality Register (annexure 1).

Approving Offering

In general, no Employee is allowed to offer any Gift or Hospitality to a Third Party, on behalf of the Company, unless it is a Courtesy Gift or the Employee has obtained prior written approval from the person in charge for Compliance in the Company upon consultation with Company's Senior Management and the Group Compliance Function.

Gifts and Hospitality can only be offered to the extent that they are modest, both in value and frequency, and provided that the time, mode and purpose of such a remittance are appropriate and duly approved.

The Employee must declare any offered Gift or Hospitality to person in charge for Compliance in the Company or the Group Compliance Function, with such required information as provided in the Gift & Hospitality Register.

Declaration

All receipts and offerings of Gift and Hospitality must be declared to the person in charge for Compliance in the Company or the Group Compliance Function, within 2 days of the date of receipt or offer.

Such Gift or Hospitality received or offered shall be duly recorded in a Gift & Hospitality Register (refer to Annexure 1) by the person in charge for Compliance in the Company or the Group Compliance Function.

Any Gift or Hospitality received or offered in accordance with the defined procedures and spirit of his policy shall not be construed as a bribe or act of corruption.

Is a gift given or received acceptable?

What is unacceptable?

Some non-exhaustive examples are:

- Anything which is illegal as per laws, regulations and practices;
- Anything offered to or received someone who is about to make a business decision relevant for the company e.g. the award of a contract, selection of a supplier;
- Anything that that would cause the company or yourself to be embarrassed if publicly reported;
- Anything that contravenes the recipient's own rules, including government officials who in many countries are themselves subject to particularly stringent regulation;



- Any gift or benefit that has to be kept secret from other colleagues, their immediate Manager or any other relevant parties;
- Cash or cash equivalents, such as shares, regardless of the amount involved; and
- Information which may give rise to insider dealings;
- Sexual favours.

What requires special attention?

The following non-exhaustive examples may be acceptable, but require special consideration, and must be authorised by the CEO, General Manager (GM) or equivalent of the Company:

- Travel expenses and entertainment from or to third parties involving flights and overnight stays;
- The inclusion of partners at corporate hospitality events or gifts;
- Invitations to particularly expensive cultural or sporting events e.g. World Cup finals;
- Gifts on special occasions above normal practices of the Company e.g. for births and weddings.

The same principle applies to all such cases; if the gift or benefit is seen as an improper attempt to influence a business decision, then interests of company officials must be disclosed to the CEO, GM or equivalent to avoid Conflicts of Interests.

What is commonly acceptable?

The following examples are normally acceptable:

- Token seasonal gifts, where such gifts are a common cultural feature and the value of the modest gift is within the company's financial limits;
- Modest, occasional meals with a business partner that fall within the Company's financial limits;
- Small corporate and promotional gifts e.g. pens marked with the company logo and similar items;
- Occasional attendance at ordinary sporting or cultural events e.g. theatre performances/ concerts;
- Travel and lodging expenses specifically related to the promotion, demonstration or explanation of products or services. Note: family members of the recipient are not entitled to travel expenses.



If in doubt

You should seek advice from the GM or HR-in charge or ER Group's Ethics Officer.

For any question, you may use the Group's online reporting channel, Speak Up, which can be accessed through:

- a link on the Group Companies' websites, as well as on MyExperience
- QR codes displayed in emails, on websites and in various locations within Group Companies.

<https://er.whispli.com/speakup>



Violation of this Policy

Any breach or failure to adhere to the provisions of this Policy may lead to appropriate disciplinary action and/or the matter being reported to the relevant authorities. A deliberate act of concealing information (in terms of gifts or hospitality received or offered) shall be construed as a prima facie case of misconduct, which may lead to dismissal.

Revision of the Policy

The Policy shall be reviewed and updated in accordance with amendments to mandatory legal provisions and on a periodic basis to ensure it remains relevant to ER Group. The revised version of the document will be submitted to the Board of ER Group Limited for approval and once approved will automatically apply to the Associated Companies within ER Group to which this Policy applies.

Requests for revision or amendments to this document must be submitted to the Group Compliance Function for review and subsequent updates. A list of authorised changes to the Policy will be summarised in the revision history as shown on cover page.

Related Documents

- Code of Ethics
- Responsible Sourcing Policy
- Speak-Up Policy

