



Gifts, Hospitality & Entertainment Policy Statement

PURPOSE

The purpose of this Gift, Hospitality and Entertainment Policy statement is to establish clear guidelines for our employees, relevant persons and associated parties regarding the giving and receiving of gifts, entertainment, and hospitality.

Our objective is to:

- Maintain the highest standards of ethical business conduct.
- Prevent potential conflicts of interest.
- Ensure compliance with applicable anti-corruption laws.
- Protect the organization's reputation and integrity.

SCOPE

This Policy applies to all employees across the organization, including full-time, part-time, contract, and temporary staff. It also extends to subsidiaries, agents, consultants, and contractors acting on behalf of the organization, as applicable. The policy covers all business interactions, transactions, and activities globally, regardless of geographic location

POLICY STATEMENT

We recognize that modest business gifts, entertainment, and hospitality can help build goodwill and strengthen professional relationships. However, we are committed to maintaining strict ethical standards and preventing any appearance of impropriety.

1. The appropriateness of any hospitality received by shall be determined by applicable laws and regulations. If applicable laws and regulations do not prohibit the acceptance of hospitality, the following may be considered appropriate under specific circumstances:
 - Occasional business meals.
 - Small company souvenirs.
 - Modest tickets to sporting or cultural events.
 - Limited travel to business events with business associates.
2. We strictly prohibit:
 - Gifts, entertainment, or hospitality that:
 - o Exceed modest value as determined by the Anti-Bribery and Anti-Corruption Policies.
 - o Create an actual or perceived conflict of interest.
 - o Might be interpreted as an attempt to improperly influence business decisions.
 - o Violate local or international anti-corruption laws.
 - Any gifts or entertainment that could be construed as bribes or illicit payments.



3. When evaluating the appropriateness of gifts or entertainment, employees should consider:

- The frequency and value of the offer.
- The potential impact on business relationships.
- Compliance with local and international anti-corruption regulations.
- Potential conflicts of interest.

4. Employees are expected to:

- Immediately report any suspicious gifts or entertainment offers.
- Seek guidance from the Compliance or Legal Department when uncertain.
- Use the established reporting mechanisms if potential violations are identified.

5. Violations of this policy may result in disciplinary action, up to and including termination of employment, and potential legal consequences.

6. Employees can report potential violations through:

- Confidential reporting systems.
- Direct communication with Compliance or Legal Departments.
- Anonymous reporting channels.

This policy will be reviewed periodically to ensure its continued effectiveness and alignment with evolving business practices and regulatory requirements.

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