

<p>Eastron Europe Limited Hospitality and Gifts Policy February 2023</p>
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1. Introduction

- 1.1 Eastron Europe Limited (“the Company”) recognises that trust and confidence in the propriety of its activities is essential to its continuing success and growth. In order to foster the trust and confidence that clients, suppliers, workers and the community in general have in the Company, it is important that the Company, its employees and agents behave, and are seen to behave, appropriately and honestly at all times.
- 1.2 This Hospitality and Gifts Policy aims to:
 - 1.2.1 Protect the reputation of the Company;
 - 1.2.2 Protect employees from accusations of impropriety;
 - 1.2.3 Ensure that all clients and suppliers are dealt with on an equal basis;
 - 1.2.4 Avoid any potential conflicts between employees’ private interests and professional duties;
 - 1.2.5 Instil a strong anti-corruption culture in the Company and put in place a gift and hospitality monitoring process to further compliance with the Bribery Act 2010.
- 1.3 Employees are advised that, notwithstanding anything contained herein, where there is any doubt over the permissibility or propriety of accepting a gift or hospitality offer they should decline that offer. Nothing should be accepted which would bring the Company into disrepute.
- 1.4 This policy applies to the Company and to any associated persons as defined by the Bribery Act 2010.

2. Receiving Gifts

- 2.1 Save for gifts of low value and which are mere tokens (such as promotional pens, calendars and stationery), excluding money, employees of the Company are not permitted to accept any gifts from customers, suppliers or other third parties involved with the Company.
- 2.2 The Company recognises that there may be exceptional instances when refusing a gift will cause significant offence or embarrassment. In such instances the gift may be accepted and subsequently donated to a charity of the Company’s choice.
- 2.3 Where practicable any employee minded to accept a gift should first seek approval from their manager. If it is not practicable to gain prior approval, the accepting employee should inform a Director as soon as possible after receiving the gift.
- 2.4 An accurate record must be kept of all gift offers made to the Company or to employees of the Company by third parties, and must be filed in the “Hospitality and Gifts Register” (“the Register”). Any employee who is offered a gift which is not merely a token should record, as soon as is reasonable practicable:

- 2.4.1 A description of the gift offered;
- 2.4.2 An estimation of the value of the gift offered;
- 2.4.3 Whether it was rejected or accepted;
- 2.4.4 If accepted, why it was accepted;
- 2.4.5 Whether prior approval was obtained, and if so, from whom; and
- 2.4.6 Who it is donated to (see sub-Paragraph 4.4 below).

3. Hospitality

- 3.1 “Corporate Hospitality”, for the purposes of this policy, is any form of accommodation, entertainment or other hospitality provided for an employee of the Company by a third party and which is extended to the employee solely or significantly due to his position as a representative of the Company. This excludes the classes of hospitality particularised at paragraph 3.2 below.
- 3.2 For the purposes of this policy and for the sake of clarity, the following are not normally considered Corporate Hospitality and will not require any approval prior to acceptance:
 - 3.2.1 Normal working lunches or refreshments provided during a business visit;
 - 3.2.2 Hospitality extended to employees attending a Company approved seminar, conference or other external event, provided that such hospitality is extended to all who are in attendance;
 - 3.2.3 [Benefits derived from frequent traveller schemes, awarded during travel paid for by the Company];
 - 3.2.4 Free seminars, talks or workshops, provided that they are free to all in attendance and are not provided solely for employees of the Company.
- 3.3 All employees are required to obtain approval before accepting any form of Corporate Hospitality which is offered to them. Approval must be sought from their Line Manager.
- 3.4 An accurate record must be kept of all Corporate Hospitality offered to the Company or to employees of the Company for entry on the Register. Any employee offered any form of Corporate Hospitality must record, as soon as is reasonable practicable:
 - 3.4.1 A description of the hospitality offered;
 - 3.4.2 An estimation of the likely value of the hospitality;
 - 3.4.3 Whether it was rejected or accepted;
 - 3.4.4 If accepted, why it was accepted; and
 - 3.4.5 From whom prior approval was obtained.

4. Hospitality and Gifts Register

- 4.1 The Register shall be held by the Directors (“the Registrar”).
- 4.2 All offers of gifts and hospitality must be recorded in writing, including all of the

information specified in this policy and must be signed and dated by the employee and the relevant manager before being given to the Registrar, who shall update the Register accordingly.

- 4.3 The written record must be completed as soon as is reasonably practicable, and be filed with the Registrar within 7 working days of the offer of the gift or hospitality.
- 4.4 It is anticipated that instances may arise where a gift accepted by the Company or one of its employees has not been donated by the time that the relevant entry is made on the Register. In such cases the Register must be updated within 7 working days of the date on which the donation was made.

5. Breach of this Policy

- 5.1 Compliance with this policy is essential to the protection of the Company's reputation and that of its employees. Any employee or associate person who is found to have acted in contravention of this policy or its principles may be subject to disciplinary action, including summary dismissal where the breach amount to gross misconduct.
- 5.2 Any employee or any associated person (as defined by Section 8 of the Bribery Act 2010) found giving or receiving bribes or bribing a foreign official will face criminal charges under the provisions of the Bribery Act 2010. Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

This policy has been approved & authorised by:

Name: Paul Boughtwood
Position: Managing Director
Date: February 2023
Signature:

