

GIFT AND HOSPITALITY POLICY

1. Background

It is often customary and appropriate to make gifts or to provide hospitality, in the course of business. Employees may likewise be offered gifts, hospitality, or other benefits by suppliers or other business contacts. RA's policy is to always behave ethically in the conduct of its business. RA will not tolerate bribery, either solicited, offered, received, or given. We want to encourage all business partners to observe the same high standards.

Bribery is a criminal offence, and as such, RA does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor does RA accept bribes or improper inducements. A breach of this rule will result in disciplinary action up to and inclusive of dismissal and/or referred to the relevant authorities. In addition, employees must report any wrong-doing, or suspicions of wrong-doing either directly to their line manager or through submitting a report to the RA whistleblowing web page (Ethics point) via <https://raints.whistlelink.com/>.

As RA operates in different jurisdictions, some RA guests, such as Government officials, may be subject to specific rules which limit or, in some cases, prevent them from accepting gifts and hospitality. Therefore, RA employees, RA subcontractors, and suppliers must be vigilant when working in different jurisdictions and must be aware of the local applicable rules and regulations before getting engaged in any act of offering gifts and hospitality.

2. Policy Purpose

This Gift and Hospitality Policy ("the Policy") sets out the procedure that RA personnel must follow when giving or receiving gifts and/or hospitality.

It applies to all RA directors, officers, full time and part time employees, contractors, consultants, representatives, intermediaries, suppliers, subcontractors and any other third parties retained by RA.

3. Definitions

The term *gifts* mean goods, services or any item of value provided to, or received from, a third party including but not limited to tangible goods, vouchers, coupons and/or luxury objects.

Items of *nominal value* means items such as branded stationery, greetings cards, calendars.

The term *hospitality* includes meals, travel, and entertainment, such as golf, theatre, and sporting events.

A *public or government official* includes:

- a person who holds a legislative, administrative, or judicial position of any state.
- a person who performs public duties or functions for any state, including a

person employed by a board, commission, corporation or other body or authority that is established to perform a duty or function on behalf of the foreign state, or is performing such a duty or function; and

- an official or agent of a public international organization that is formed by two or more states or governments, or by two or more such public international organizations.

If at any time you are unsure as to whether you are dealing with a public official, please contact the Compliance Officer.

4. Policy Statement

Bona fide hospitality, promotional, or other business expenditures which seek to improve the image of the organization, or establish cordial relationships are recognized as established practices of doing business.

Anti-corruption laws do not prohibit gift giving or hospitality, but they do prohibit bribes made under the guise of those legitimate business practices.

This Policy adopts the principle that, as a general rule, RA personnel must never offer or accept a gift or hospitality to/from any customer, supplier, or any other person or company if the gift or hospitality could be perceived as an attempt to improperly influence a business transaction.

However, RA also recognizes that, although infrequently, there may be situations where it is culturally appropriate to offer or receive a gift or hospitality with a related business purpose, to or from a customer or supplier at the condition that all gifts or hospitality offered or received are:

- a) In good faith.
- b) Not offered, promised, or accepted to secure an advantage for RA or any of its employees or associated persons, or to influence the impartiality of the recipient.
- c) Has limited commercial value.
- d) Not be cash or cash—equivalents (e.g., stored value cards) or means of payment similar to cash, like bank transfers; securities, such as stocks and bonds; gold, precious stones, and other precious metals; vouchers and gift cards; no-interest or low-interest loans.
- e) Of a nature or value as not to constitute a real personal enrichment of the recipient or create an obligation on the part of the recipient.
- f) Not contrary to the known provisions of the recipient's code of conduct.
- g) Legally permitted and in accordance with local business practices.
- h) Neither offered nor received too frequently, nor at an inappropriate time (i.e., tender phase, pending legal proceedings, sensitive negotiations etc.)
- i) Recorded fairly and accurately in RA's forms and records.

This Policy complements RA ABC Policy and Code of Conduct and plays an important part in demonstrating RA strong commitment to avoid bribery and corruption.

Procedures

4.1 Permitted gifts & hospitality

RA employees may give and accept reasonable and appropriate gifts and/or hospitality for legitimate business purposes. RA appreciates that normal business practices, in certain regions, may include holding meetings over lunch and dinner.

However, it is your responsibility, as RA employee, to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or RA’s public and statutory duties.

You should not be seen to be securing valuable gifts and hospitality by virtue of your job. You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influencing while acting in an “official capacity”.

In addition, you need to consider the frequency and cumulative value of exchanges with the same recipient. It is not acceptable to keep offering gifts and/or hospitality to the same recipient or receive repeated gifts and/or hospitality from the same donor, even if each individual gift is of low value.

4.2 Approval process and procedure

4.2.1 Certain Gifts and Hospitality received or offered must be registered and/or approved according to the following table:

		without pre-approval	with pre-approval	Approver	To be registered	Notes
Gift (*) (Either given or received)	Nominal Value	✓	X		X	e.g., branded stationery, greetings card, calendars
	< \$20	✓	X		X	
	>\$20	X	✓	Line Manager	✓	
Business meals	Business-related meals	✓	X		✓	Appropriate business-related meals of reasonable (*) amounts will be deemed routine hospitality.
Hospitality (*) (either given or received)	Nominal Value	✓	X		X	e.g., drinks and refreshments provided in ordinary course of business meeting
	Any other form of hospitality	X	✓	Compliance Officer	✓	

(*) if you are in doubt about the market value of a Gift or Hospitality event received/intended to be offered consult your Line Manager or the Compliance Officer.

4.2.2 All gifts and hospitality, given or received by RA employees, that require a pre-approval must be recorded in the 'Record of Gifts/Hospitality Received & Provided' form (Appendix 1) by employees involved in such scenarios.

As an alternative RA employees can send an email to the Compliance Officer including the following information:

- Date of offer of gift or hospitality, and date of event where relevant.
- Name, job title and organisation of recipient / provider.
- Nature and purpose of gift or hospitality received or declined.
- The name of any other organisation involved.
- Estimated value.

4.2.3 Upon completion of the form, it must be forwarded to the Compliance Officer in Dubai H.O. within 5 working days of the event and the data recorded therein shall be recorded and logged on the 'Register of Gifts/Hospitality Received & Provided' form, maintained by the Compliance Department, in accordance with the requirements of this policy.

4.2.4 If it's not possible to obtain prior approval of impromptu hospitality, whether given or received, employees must nevertheless make the appropriate record in the register of gifts and hospitality and obtain the countersignature of a Line Manager.

4.2.5 When offering gifts/hospitality to others, bear in mind that:

- The employee must account for and reclaim all expenditure in relation to the provision of gifts and hospitality in accordance with the 'Business Travel & Expenses' policy.
- If the person approving the employee's expenses is not satisfied that it was reasonable and appropriate, reimbursement may not be approved.
- RA and external authorities reserve the right to audit the giving/receiving of gifts and/or hospitality.

4.3 Dealing with any government official(s)

In the event where RA employees engage with Government Official, special care must be taken to avoid any appearance of improperly influencing them in the performance of their official duties. Legitimate promotional expenses and gifts to a Government Official or employee, agent, or representative of another company (for example, a business meal, modest gifts at holidays, and routine items bearing the Company logo) may be incurred if:

- They have a limited value and are not lavish, extravagant, or frequent, and comply with local policies and procedures.
- They are directly related to the promotion, demonstration, or explanation of RA products and services.

- They are not intended to influence the Government Official or employee, agent, or representative of another company.
- They are customary and proper under the circumstances, give no appearance of impropriety, and are consistent with Company business ethics.
- They are openly incurred (there is no effort made to conceal them either by the donor or the recipient);
- They are permissible under the written laws and regulations of the country in which the Government Official, employee, agent, or representative of another company is a citizen or resident; and
- They will not impose any obligation on the recipient with respect to the donor.
- They are provided during business events and/or meetings associated with the visit. Individual meetings are not allowed (2 pax min required).

4.4 Register and recording of gifts & hospitality

Under the UK Bribery Act, the offering of any gift or benefit to a U.K. public official is deemed to be a corrupt payment, unless the contrary is shown. For this reason, it is essential to maintain appropriate records of any such gift or benefit offered in the Gifts & Hospitality Register.

The Compliance Officer must ensure that a register of gifts and hospitality is established and maintained. Anyone wishing to access and view this controlled document will be required to give a legitimate reason and purpose.

All records must be accessible upon request to:

- Senior Members of RA Management in Dubai and Members of Board of Directors of RA International Group PLC
- Internal Audit, Group Tax, the company's external auditors and relevant investigatory bodies.

The Gifts & Hospitality Register, must show the following information in relation to each offer or receipt of a gift or hospitality made by, or to, an employee, other than a gift or hospitality which is excluded by this policy from the recording requirement:

- The date on which the record is made
- A description of the gift or hospitality offered or received.
- The date on which the offer was made or received
- The name, job title and the employer of the giver
- The name, job title and the employer of the intended recipient
- The actual cost, or were permitted by the policy, the estimated cost of the gift/hospitality
- The reasons for the making of the offer, or justification for the receipt

- Whether or not the gift or hospitality was accepted, and if so, whether by the individual or on behalf of the company
- The name and signature of any required authorizer and the date of authorization.

Regular reviews will be carried out on the Register of Gifts & Hospitality, including tests of completeness. Where these reviews identify repeated patterns of gifts/hospitality to the same person(s), over a period of time, or if there are cases of excessive or inappropriate gifts or hospitality, then these will be investigated and could lead to disciplinary actions.

Employees must report the making of any payment or gift falling within the terms of this section in writing to the CEO and the Compliance Department as soon as possible (within a maximum of 5 working days from the event), detailing the date, time, place and circumstances of the incident, the identity of the person making the demand (if discernible) and any independent witnesses to the incident.

5. Responsibility and Accountability

Any gifts or hospitality offered by RA employees to individuals or companies, which RA are currently or proposing to engage with, should ensure that they are in line with the guidance as set out within this policy.

RA employees who have management responsibilities, must ensure that they:

- Implement this policy.
- Put in place procedures to ensure that the giving and receipt of gifts, hospitality and personal benefits are properly approved and recorded in accordance with this policy.
- Reviewing at sole discretion and upon request, all matters relating to the operation of, and compliance with, this policy.
- Where appropriate advising, the Group's Senior Management/Compliance Manager of sustained breaches of this policy and recommending corrective action.
- Recommending and implementing amendments to this policy, as a result of changing legal requirements, industry best practice or breaches identified.
- Where managers have questions or concerns about a specific gift and/or hospitality request, they are required to contact the Compliance Officer for direction.

5.1 Guidance, reporting of concerns and code of conduct

If any employee witnesses an act in breach or in violation of this policy, or has suspicions of any impropriety, then they must report the matter to their Line Manager, the Compliance Manager, any Senior Manager in Dubai H.O. or alternatively, submit a report on Ethics Point (rains.ethicspoint.com).

GIFT AND HOSPITALITY POLICY



Employees could be subject to disciplinary action by not complying with this policy. Additionally, by not reporting any violations or suspicions, employees raise the levels of risk of prosecution and/or fines under the UK Bribery Act, not only to the company but to themselves.

A handwritten signature in blue ink, appearing to read 'narfeldt', written over a horizontal line.

Soraya Narfeldt

CEO

Policy Implementation/ Review Date	Next Policy Review Date
April-2025	June-2026