

Hospitality & Gifts Policy

1. Introduction

- 1.1 Reddington Crane & Company Limited and its subsidiaries (“the Company”) recognise that trust and confidence in the propriety of its activities is essential to its continuing success and growth. To foster the trust and confidence that clients, suppliers, workers and the community in general have in the Company, it is essential 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 robust anti-corruption culture in the Company and put in place a gift and hospitality monitoring process to further compliance with the jurisdictional Bribery Acts.
- 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 any associated persons as defined by the Bribery Act 2010.

2. Receiving Gifts

- 2.1 Except for gifts of low value, 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. This definition of 'low value' gifts is to provide clear guidelines and prevent misinterpretation.
- 2.2 The Company recognises that there may be exceptional instances when refusing a gift will cause significant offence or embarrassment. In such cases, the gift may be accepted and subsequently donated to a charity of the Company’s choice.
- 2.3 When considering accepting a gift, the employee should first seek approval from the Compliance Manager. If prior

authorisation is not feasible, the accepting employee should inform any Director as soon as possible after receiving the gift. This process ensures transparency and accountability in all gift-related transactions.

- 2.4 An accurate record must be kept of all gift offers made to the Company or 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 reasonably 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 was it 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 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 in paragraph 3.2 below.
- 3.2 For clarity, the following are generally not considered Corporate Hospitality and will not require any approval before acceptance:
 - 3.2.1 Normal working lunches or refreshments provided during a business visit
 - 3.2.2 Hospitality extended to employees attending an 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 accessible to all in attendance and are not offered solely for employees of the Company.
- 3.3 All employees must obtain approval before accepting any form of Corporate Hospitality offered to them. Approval must be sought from the Compliance Officer or, where the Corporate Hospitality value is likely over EC\$100, from a Director.
- 3.4 An accurate record must be kept of all Corporate Hospitality

offered to the Company or employees of the Company for entry on the Register. Any employee offered any form of Corporate Hospitality must record, as soon as is reasonably 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 was it received, and
- 3.4.5 From whom prior approval was obtained.

4. Hospitality and Gifts Register

- 4.1 The Register shall be held by the Compliance Officer (“the Registrar”).
- 4.2 All offers of gifts or hospitality must be recorded on a Register Entry Form, available from the Compliance Officer. The Register Entry Form must be signed by the employee and countersigned by the relevant manager before being returned to the Registrar.
- 4.3 The Register Entry Form must be completed as soon as reasonably practicable and filed with the Registrar within five 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 the relevant entry is made on the Register. In such cases, the Register must be updated within five 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 protecting the Company’s reputation and employees. Any employee or associate found to have contravened this policy or its principles may be subject to disciplinary action, including summary dismissal where the breach amounts to gross misconduct.
- 5.2 Any employee or any associated person found giving or receiving bribes or bribing a foreign official will face criminal charges under the provisions of any Bribery Act from any jurisdiction.
- 5.3 Anyone guilty of bribery will be responsible for bearing any related remedial costs, such as losses, court fees or expenses.