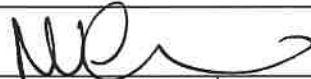


# REHM GRINAKE CONSTRUCTION CO. LTD

*Quality on time*

## GIFT POLICY

DOCUMENT NUMBER	HR-GP-POL002		
DOCUMENT NAME	GIFT POLICY		
EFFECTIVE DATE	01 NOVEMBER 2020		
PREPARED BY	NEIL VINCENT CLOETE		
REVIEWED BY	EXCO		
APPROVED BY	NEIL VINCENT CLOETE		
DATE REVIEWED	OCTOBER 2020	VERSION NUMBER	2
PATH NAME	<a href="https://rgmur.sharepoint.com/sites/hr/PoliciesandProcedures/SitePages/Home.aspx">https://rgmur.sharepoint.com/sites/hr/PoliciesandProcedures/SitePages/Home.aspx</a>		
DATE OF NEXT REVIEW	NOVEMBER 2021		

## REVISION HISTORY

REV	DATE	REVISED BY	REVISION
02	October 2020	Paramasiven Moothien Pillay	Changes in clause 3.6 and 6.7
01	June 2018	Neil Vincent Cloete	Initial Version

## **1.0 PURPOSE**

- 1.1 This policy is designed to give guidance to the receiving and giving of gifts by REHM Grinaker and/or its employees.
- 1.2 REHM Grinaker values its reputation for ethical business practice. The Company's values include "Accountability" and "Integrity".
- 1.3 The Company has a Code of Business Conduct requiring all employees to be impartial. REHM Grinaker is a Member of Transparency Mauritius.
- 1.4 The Company recognises that in a world where Governance is paramount, that it cannot have a subjective approach in respect to gifting.
- 1.5 No matter how well-meaning or well-intentioned a gift, the potential exists for impropriety or the appearance of impropriety to be present because of the existence and acceptance of the gifts.

## **2.0 ELIGIBILITY**

- 2.1 This policy refers to all our employees of REHM Grinaker Construction Co. Ltd.

## **3.0 DEFINITIONS**

- 3.1 Company means REHM Grinaker Construction Co. Ltd.
- 3.2 EXCO means Executive Committee comprising of senior staff members of the Company. Its composition will be dictated by the Company and may vary from time to time.
- 3.3 Employees means all permanent, part-time, temporary and contract employees.
- 3.4 MD means Managing Director.
- 3.5 H.O.D means Head of Department.
- 3.6 Gifts means items, goods, services, information, money in whatever form, free attendance to a workshop especially overseas, free air tickets, contribution to purchase of personal assets from which the recipient may derive benefit as well as any other benefit or gratuity.
- 3.7 Stakeholders means any organisation, shareholder, vendor, subcontractor, suppliers, service provider, employee, client, consultant, or potential vendor, potential subcontractor, potential supplier, potential service provider, potential employee.

## 4.0 POLICY

All REHM Grinaker Construction Co. Ltd employees are prohibited from soliciting, accepting or receiving any gifts, directly or indirectly other than in terms of the procedures prescribed in this policy. This also applies to the giving of a gift.

- 4.1 In order to demonstrate the highest standards of ethics and conduct in relation to all potential or actual vendors, suppliers, subcontractors, service providers and other stakeholders, REHM Grinaker has a **Zero Gift Policy**. This applies both to receiving and a giving of a gift.
- 4.2 To avoid conflict of interest, the appearance of a conflict of interest, or the need for our employees to subjectively examine the ethics around accepting gifts, REHM Grinaker and its employees do not accept gifts from any stakeholder under any circumstances save as listed in exemptions below.
- 4.3 This Zero Gift Policy ensures that employees practice equal treatment, unbiased professionalism, and non-discriminatory actions in relation to all stakeholders and any individual or organization with whom they come into contact.
- 4.4 Stakeholders need to be advised of our policy annually in which they are requested to respect our company policy and to not purchase and/or deliver any gift for any of our employees, a department, an office or the company, at any time, for any reason.

### 4.5 EXEMPTIONS

Exempted from this policy are: -

- 4.5.1 Gifts such as non-commercial company branded t-shirts, pens, trade show bags, calendars, diaries, desk pads or note pads.
- 4.5.2 Food and beverages that occur during the course of normal business or relationship building exercises.
- 4.5.3 Moderately priced entertainment including local sports or a business lunch or dinner that is provided or arranged as part of a “working” meeting or session to benefit and advance positive working relationships and company interests. These activities are expected to be reciprocated by REHM Grinaker in turn.
- 4.5.4 Invitations to local functions to which the industry or members of the public are invited such as Chamber of Commerce functions, ceremonial openings, press events, trade exhibits and networking functions. Attendance at these functions would be in the interests of building positive business relationships.
- 4.5.5 Any thank you notes, certificates, or other written forms of thanks and recognition.

#### 4.6 IF A GIFT IS RECEIVED

4.6.1 If feasible, the gift is returned to the supplier.

4.6.2 If it is not feasible to return the gift, the gift must be: -

- Ruffled off to all employees. Proceeds from the raffle will be donated to a charity that the social committee has identified for the calendar year.  
OR
- Included in a year end “tombola” or lucky draw for all employees

4.6.3 Gifts such as plants or flowers will be displayed in the lobby, or at another central location where all employees may enjoy their presence.

4.6.4 Gifts of food or beverages that may arrive during the holidays, and at other times of the year when gift giving is traditional, belong to the entire staff even if addressed to a single employee. Under no circumstances may an employee take a food gift home; food gifts must be shared with and distributed to all staff, with email notification, during work hours, in central, worksite locations.

#### 4.7 INTERNAL GIFTS AND ENTERTAINING

4.7.1 Meals and entertainment involving only REHM Grinaker Construction Co. Ltd employees (internal entertaining) should be in line with responsible business practice and norms.

4.7.2 Gifts such as fruit basket for new born babies and mothers, flowers for funerals, “get well” gift for hospitalized employee, etc. are considered as acceptable in this policy.

4.7.3 Corporate Gifts (e.g. diary, calendars, long service awards, etc.) are considered as acceptable in this policy.

### 5.0 DISCIPLINARY

5.1 Failure to comply with any of the responsibilities in this policy will result in disciplinary action, which may include termination of employment

### 6.0 POLICY INTEGRATION

6.1 Disciplinary Policy Procedure. *(Available on SharePoint)*

6.2 Code of Business Conduct. *(Available on SharePoint)*

6.3 Code of Ethics. *(Available on SharePoint)*

6.4 Conflict of Interest Policy and Procedures. *(Available on SharePoint)*

- 6.5 Terms and Conditions of Contract of Employment.
- 6.6 Transparency Mauritius Principle.
- 6.7 Transparency Mauritius Ethics Hotline.
- 6.8 Whistle Blowing Policy. *(Available on SharePoint)*