

RIVERVIEW RUBBER ESTATES, BERHAD

Gifts, Entertainment and Hospitality Policy

1.1 OVERVIEW

Business gifts and entertainment on a modest scale are commonly used to build goodwill and strengthen working relationships among business partners. Providing or accepting occasional meals and small company mementoes may be appropriate in certain circumstances. However, offers of gifts or entertainment that are frequent or of substantial value may create the appearance of, or an actual, conflict of interest or illicit payment.

1.2 PURPOSE

This policy is developed to help employees make the right decisions when providing or accepting gifts and entertainment while conducting business on behalf of Riverview.

1.3 SCOPE

This policy applies to all Directors and Employees of Riverview. Although this policy is specifically written for Riverview Group employees and directors, Riverview expects that contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group will comply with it in relevant part when performing such work or services.

1.4 PRINCIPLES

Riverview has adopted a “No Gift” Policy whereby, subject only to certain narrow exceptions, employees and directors, family members or agents acting for or on behalf of the Group are prohibited from, directly or indirectly, receiving or providing gifts.

Riverview requires employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between Riverview and external parties as a gift can be seen as a bribe that may tarnish Riverview’s reputation or be in violation of anti-bribery and corruption laws.

1.5 RECEIVING GIFTS

Only in very limited, rare and defined cases is it permissible for employees to receive gifts such as during festive seasons where giving gifts is a central part of business etiquette or refusal of such might be taken as a gesture of disrespect.

Such gifts may be accepted if the following requirements are met:

- It is not a personal gift and is intended for the general estate welfare;
- Gifts are 3Fs i.e. Food, Fruits and Flowers or anything without commercial value. Definition of commercial value is ‘the value that a thing would have if it were offered for sale’ (i.e. the gift/ benefit-in-kind can fetch a re-sale value).

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1.5 RECEIVING GIFTS (CONT'D)

In these limited circumstances, employees are expected to immediately record the gift in the Gift Register at respective estate.

The General Manager must determine the treatment of the gift whether to:

- Donate the gift to charity; or
- Hold it for departmental display; or
- Share with other employees in the estate.

1.6 PROVIDING GIFTS

Generally, employees are not allowed to provide gifts or entertainment to third parties. Although the Group practices a “No Gift” Policy, there are certain exceptions to the general rule whereby the provision of gifts is permitted in the following situations:

- Gifts from company to external institutions or individuals in relation to the company’s official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- Gifts from Riverview to employees and directors and/or their family members in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an employee’s/director’s service to the Company); and
- Gifts to external parties who have no business dealings with the Group (e.g. monetary gifts or gifts in-kind to charitable organisations).

Such gifts may be given by exercising proper judgment in handling gift activities in a manner consistent with the general principles set out per below:

- Conscientiously maintain the highest degree of integrity;
- Always exercise proper care and judgment;
- Avoid conflicts of interest;
- Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of Riverview; and
- Comply with applicable laws, regulations and policies and procedures.