

GIFTS AND HOSPITALITY GUIDELINES

“Third Parties” include any current or prospective supplier, contractor or customer of IOI Group, and any person with whom IOI Group does or may do business

“Government Official” includes persons employed at any State local authority, statutory body, or a member of any political body or organisation

“Head of Business Division” means the person heading up any particular division or key business unit in the IOI Group’s organisational structure

GIFTS

Gifts include (but are not limited to):

- Tickets to sports, music or cultural events where IOI Group employees and representatives of the Third Party providing the tickets do not attend the event together
- Merchandise (for example, gift baskets, wine, clothing, mugs, pens, collectibles and hospitality bags)
- Travel or lodging not associated with a business conference, meeting or event
- Favourable terms or discounts on a product or service for the IOI Group employee’s benefit that are not otherwise available to all other IOI Group employees

Gifts FROM Third Parties:

- IOI Group employees may accept nominal gifts up to a market value not exceeding **RM400 per gift**, and which may only be accepted in conjunction with the public festival periods celebrated in that locality in any one year
- Any such nominal gift where received or directed to an IOI Group employee shall be for the enjoyment and benefit of the IOI Group employee’s particular Unit or Department
- Acceptance of any individual gift greater than the value of RM400 must be disclosed and approved by the Head of Department
- Gifts of cash or cash equivalents (such as gift cards, gift certificates or “ang pau” packets commonly offered in Asia) must never be accepted
- IOI Group employees may not solicit gifts from Third Parties
- When dealing with business associates and partners from foreign countries, Head(s) of Business Division(s) are exempted from the above value threshold and may exercise their best judgment and discretion in accordance with the commonly accepted foreign customs and practice.

Gifts TO Third Parties:

- IOI Group employees may offer nominal gifts up to a market value not exceeding **RM400 per gift**, and which may be given in conjunction with the public festival periods celebrated in that locality in any one year
- Expenses for gifts to Third Parties must be disclosed to the Head of Department, and appropriately documented
- Any gifts given to any Government Official by yourself, or on IOI Group’s behalf must comply with the relevant laws or policies applicable to the Government Official, and be approved by the Head of Department in advance
- When dealing with business associates and partners from foreign countries, Head(s) of Business Division(s) are exempted from the above value threshold and may exercise their best judgment and discretion in accordance with the commonly accepted foreign customs and practice.

HOSPITALITY (MEALS & ENTERTAINMENT)

Hospitality includes (but is not limited to):

- Meals
- Tickets to sports, music or cultural events where IOI Group employees and representatives of the Third Party providing the tickets attend the event together
- Travel or lodging associated with a business conference, meeting or event
- IOI Group employees may offer or accept reasonable and appropriate meals and entertainment to, or from, Third Parties only for legitimate business purposes, and that complies with the following guidelines:
 - Is infrequent
 - Is not solicited
 - Is not given (or appear to be given) as a bribe, pay off or kickback
 - Does not create the appearance (or an implied obligation) that the provider is entitled to preferential treatment
 - Is in good taste and occurs at a business-appropriate venue
 - Is moderate and appropriate in the context of the business occasion and your position at IOI Group
- All expenses for hospitality to Third Parties must be disclosed to the Head of Department, and appropriately documented
- Any hospitality offered to any Government Official by yourself, or on IOI Group's behalf, must comply with the relevant laws or policies applicable to the Government Official, and be approved by the Head of Department in advance.