

GIFTS AND HOSPITALITY POLICY

PURPOSE OF THE POLICY:

The Policy is intended to support Famous Brands Code of Ethics and Conduct, which encourages Ethical behavior in the workplace. This Policy serves as a guideline for Famous Brands Employees with regards to receipt and offering of gifts and hospitality gestures **internally** between Famous Brands employees; as well as between employees and **external** Business Partners, Suppliers and other Stakeholders.

SCOPE OF APPLICATION:

This Policy applies to all Famous Brands Employees, business partners and contractors (including wholly owned and controlled subsidiaries, except for associate entities). The Gift Policy is published on the internal Famous Brands Intranet, and on the external Corporate Web-page www.famousbrands.co.za.

PRINCIPLES:

- **Internal** gifting between **employees** with **company funds** is not allowed. Where it is deemed necessary on merit, such gifting must be authorized by the direct Group EXCO member.
- **Physical gifts** and **monetary items** are not permitted to be accepted or offered, and should be politely declined or returned; save for promotional items such as branded merchandise and point of sale material.
- **Providing and receiving Entertainment and Hospitality** is permitted subject to **Executive Line Management** approval in writing.
- If it is anticipated that the value of the entertainment and hospitality is likely to exceed R1000 per person per event then the direct **Group EXCO member** approval is required in writing.
- As a general principle no gift, entertainment or hospitality must be accepted or offered if it is not in moderation, or the intention is to influence fair judgement.
- **Frequent** exchange of any gifts, entertainment or hospitality between the same parties, even if below the determined thresholds is not permitted.
- **Charitable donations and sponsorships** by Famous Brands are not classified as personal, and are permitted in the normal course of business.

- Any type of exchange of a gift, entertainment or hospitality on behalf of Famous Brands is not permitted with **public officials** e.g., government, municipal, and/or police representatives.
- It is the responsibility of each employee or business partner or contractor to comply with this policy and failure to do so could amount to a material breach of the relevant **enforceable contract**.

PROCESS:

The following process is to be followed at all times:

- Notwithstanding that **physical gifts** shall not be received/offered, if physical or monetary gifts of any value are delivered unsolicited, they are to be returned. If this is not possible, they are to be stored on site and disposed of from time to time, with the benefits to be donated to an appropriate charity.
- All physical gifts or monetary items of any value offered or received between Famous Brands employees and Business Partners, contractors, Suppliers and External Stakeholders are to be **recorded on My Gifts** on the Famous Brands Intranet.
- All **entertainment and hospitality** of any value per person per event as mentioned in the principles above are to be **recorded on My Gifts** on the Famous Brands intranet.
- The Gift Register will be regularly reviewed by the Social & Ethics Working Group.
- **Access My Gift at:**

<http://fbljhbspv001/sites/FB/My%20Gifts%20Register/SitePages/Home.aspx>

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