

POLICY

**Tiger Brands Gifts, Entertainment
& Hospitality Policy
Supplier Communication**

Ver 1

August 2016

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POLICY

Tiger Brands Gifts, Entertainment & Hospitality Policy Supplier Communication

Document Control Information

Document Details

Document Title	Tiger Brands Gifts, Entertainment & Hospitality Policy
Document Description	Sets out the policy on the giving and receiving of gifts or entertainment by employees, and to provide guidance on its application.
Document Owner	Group Compliance Officer

Document Approval

Document Approver	Tiger Brands – Executive Legal and Group Company Secretary
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1 Introduction

Tiger Brands maintains relationships with many different stakeholders, including suppliers, contractors, consultants and other stakeholders. It is important that these relationships have a strong ethical basis and any decisions affecting stakeholders are made on sound commercial grounds. Whilst Tiger Brands recognises that gifts and entertainment can help maintain relationships and build goodwill, there is a danger that the improper giving or receiving of gifts or entertainment can lead to a conflict of interest and damage both the Tiger Brand's business and reputation. It is important not only to do the right thing but also to be seen to be doing the right thing - third parties must never be in any doubt as to our motives, values and integrity.

2 Scope

All suppliers of goods and services to Tiger Brands working in South Africa and any other country where Tiger Brands has a presence. If you are not sure as to whether a gift or entertainment can be given or received in accordance with this policy, then you should contact the Tiger Brands Group Compliance manager, Avishkar Kalicharan, on 011 840 4244 or 079 312 8089, who will be able to advise you.

3 Objective

The objective of this policy is to set out the Tiger Brands Limited ("Tiger Brands") policy on the giving and receiving of gifts or entertainment by employees, and to provide guidance on its application. All vendors need to take note of the monetary thresholds for offering or receiving of gifts to or by Tiger Brands employees. Gifts in value that exceed these thresholds cannot be accepted.

4 Policy Details

Gifts and Entertainment means anything of value given or provided to you or a close relative or provided by you to a third party in connection with your work for Tiger Brands. This will include: customers' products, customer branded clothing or items, tickets to sporting or cultural events, meals, discounts, loans, cash, travel or transportation, favourable terms on products or services, prizes, trips, customer incentive trips, hospitality events, shares, gift vouchers, invitations to conferences etc.

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Due to the wide variety of potential items caught and differing circumstances, it is not possible to be prescriptive in terms of what is or is not acceptable. Accordingly, before accepting or offering any gift or entertainment, you must consider and apply the Guidelines set out below.

With effect from 1 October 2016, each business unit will maintain a register in which certain gifts and entertainment will be required to be recorded. If necessary, you may therefore have to record the gift or entertainment in your business unit's Gift and Entertainment register and might also have to gain authorisation for the gift or entertainment from your line manager.

Guidelines

In all circumstances, you must take into account the following Guidelines:

- Good judgment and moderation must be used when considering whether to accept or offer a gift or entertainment.
- You must not give or accept gifts or entertainment for the purpose of improperly aiding a business decision or relationship or to gain an improper advantage. You must also not give or accept gifts or entertainment if by doing so could give the appearance of having an improper influence on a business relationship or decision.
- Excessive gifts or entertainment of any sort are generally unacceptable – whether in terms of frequency or value.
- Gifts and entertainment received should not be automatically reciprocated: you must avoid feeling in anyone's "debt" for gifts or entertainment received.
- "Kickbacks", that is, anything of value provided directly or indirectly for the purpose of improperly obtaining or rewarding favourable treatment, must not be offered or accepted.
- Consideration must be given to the policies of the giver's or recipient's own organisation.

Usually Acceptable:

Gifts or entertainment with an individual value of R500 or less from any one source or R5 000 over the course of one financial year do not require approval (unless they fall into the category of 'Always Wrong', below). This type of gift would include:

- Occasional meals with a business associate;

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- Reasonable sports, theatre and other cultural events;
- Other reasonable and customary gifts and entertainment; and
- Promotional items, such as point of sale materials or merchandising.

Always Wrong:

The following types of gift and entertainment are always unacceptable. Tiger employees may never accept or offer a gift or entertainment if it is:

- Illegal (in terms of the law).
- Cash or cash equivalent (such as shares, share options, gift certificates, vouchers or loans).
- A “quid pro quo” (that is, offered for something in return).
- Unsavoury, sexually orientated, or otherwise violates Tiger Brand’s commitment to acting fairly and with integrity, respect and decency in all business dealing.
- Known to be in breach of the rules of the giver’s or recipient’s own organization.

You should try to anticipate and avoid situations that might lead to an offer or receipt of an unacceptable gift or entertainment.

If a Tiger employee is offered anything that falls into the “Always Wrong” category, they will report this to the Tiger Brands Group Compliance manager and return the gift immediately. Any gift of cash or cash equivalent will be returned immediately. If appropriate, a letter will be sent to the supplier offering the gift, explaining that it cannot be accepted because of Tiger Brand’s gifts and entertainment policy.

Approval and Registration Requirements

All gifts or entertainment with a value of R500 or less, or with an aggregate value of R5 000 or less in one year from a single source, will be recorded on the Tiger Brands Gifts register.

No gifts or entertainment exceeding the value of R500 or with an aggregate value exceeding R5 000 in one year from a single source can be accepted by a Tiger Brands employee.

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All managers at Tiger Brands will be required to certify annually whether or not they have complied with this policy.

Accountability

It is the responsibility of all employees to ensure they are fully aware of company policies and that they are acting in accordance with these policies. Line Managers, HR and Group Compliance have the responsibility for monitoring compliance with this policy.

5 Enquires

Enquiries about this policy should be directed to the Group Compliance Manager.

6 Roles and Responsibilities

- 6.1 It is the responsibility of all employees to know and adhere to this Policy.
- 6.2 The Tiger Brands Group Compliance Manager has direct responsibility for the Policy, for maintaining it and for providing advice and guidance on its implementation.
- 6.3 All business unit managers are directly responsible for implementing the Policy within their business areas, and for adherence by their staff.

7 Compliance

- 7.1 Employees are required to familiarise and fully comply with this policy.
- 7.2 Any employee who fails to comply with the provisions as set out above or any amendment thereto, may be subject to appropriate disciplinary or legal action.
- 7.3 Tiger Brands' policies, standards, procedures and guidelines comply with legal, regulatory and statutory requirements.
- 7.4 This policy may be amended from time to time in the sole discretion of Tiger Brands

8 Related Documents

- 8.1 Tiger Brands Code of Ethics
- 8.2 Tiger Brands Anti-Bribery and Anti-Corruption Policy
- 8.3 Tiger Brands Gifts, Entertainment & Hospitality Policy