GIFT POLICY

OF THE

CARGO HANDLING CORPORATION LIMITED

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1. Purpose

This Policy (the "**Gift Policy**") is issued in accordance with Section C of the Guidelines on Legal Persons published by The Financial Crimes Commission ("**FCC**") on 14 July 2025. It provides guidance to all staff of the Cargo Handling Corporation Limited ("**CHCL**") on the acceptance and giving of Gifts in the business environment.

All business decisions and transactions must be made with uncompromised integrity, honesty and objectivity of judgement. Gifts provided in the course of business may be perceived as, or in fact constitute, a bribe. Employees should be aware that accepting Gifts, benefits or hospitality carries real risks: such offers may undermine their integrity, influence their behaviour, or give rise to the perception that they are being influenced in the discharge of their duties. Accordingly, any Gift must be reasonable, proportionate and accepted in good faith.

In line with the FCC requirements, CHCL adopts a risk-based approach that permits certain Gifts, provided they meet the criteria set out in this Gift Policy for distinguishing legitimate business courtesies from those which may be perceived as corrupt payments.

2. Definitions

For the purposes of this Gift Policy, a "**Gift**" means anything of value, whether tangible or intangible, given or received by any person working for or on behalf of CHCL. A Gift includes, without limitation, cash equivalents, vouchers, goods, services, discounts, loans, favours, travel-related benefits such as air tickets, hospitality items given separately from an event, promotional items, or any other benefit or advantage.

For the avoidance of doubt, a Gift does not include items of nominal value bearing CHCL's branding that are distributed generally for promotional purposes and/or branded items received during normal business relations, provided such items are of a type and value that could not reasonably be perceived as an inducement or reward.

"**Nominal value**" means a value not exceeding MUR 1,000. This threshold shall be reviewed periodically by the Administrative Manager in consultation with the Anti-Corruption Committee and may be adjusted to reflect changes in economic conditions.

Unless the context otherwise requires, any reference to an "**employee**" or "**employees**" shall be construed as including all persons working for or on behalf of CHCL, including corporate officers, directors, occasional collaborators, temporary staff, interns and volunteers.

3. Key principles

The key principle is that there is a general prohibition on the acceptance or offer of Gifts by CHCL employees, unless the Gift is one of nominal value and relates to an item given and received during normal business relations and/or falls within the exceptions set out in this Gift Policy.

An employee shall however not accept a gift of any value if it constitutes a conflict with, or creates the appearance of a conflict with, the proper discharge of his/her duties.

For the avoidance of doubt, the following categories of Gifts are strictly prohibited and must not be accepted by any CHCL employee under any circumstances, regardless of the value or context in which they are offered. These categories include, but are not limited to:

a. Monetary and monetary-equivalent Gifts, including cash, gift vouchers, store credits, pre-paid cards, or discounts of any kind;

b. Any Gift or benefit connected, whether directly or indirectly, with procurement activities. This prohibition encompasses, without limitation, meals, travel-related benefits such as air tickets, hospitality, or entertainment offered by a contractor, supplier, or prospective supplier to CHCL employees who are involved in the evaluation, award, or monitoring of contracts, as well as dinners or other events intended to facilitate, influence, or celebrate the signing or renewal of a contract. For the avoidance of doubt, this prohibition applies irrespective of the monetary value of the meal or hospitality, and regardless of whether it is offered in a formal or informal setting; and

c. Any Gift, particularly those exceeding nominal value, which is not offered for an appropriate business reason, or which may reasonably be perceived as being intended to influence a current, continuing, or prospective business relationship between the offeror and CHCL

4. Exceptions and Criteria

The general rule is that an employee is prohibited from accepting a Gift given to the latter in relation to the performance of his/her duties, except to the extent that it falls within the exceptions set out in this clause. This applies to Gifts given either directly or indirectly.

Exceptions apply to the acceptance of Gifts of nominal value presented during workshops, seminars, conferences, overseas missions and other functions which an employee attends in his/her official capacity or when participating in social and cultural events. However, due care must be exercised by the employee before accepting any Gift. He/she must make sure that the item offered clearly satisfies the criteria set out in this Policy.

For the avoidance of doubt, the exceptions set out in this Clause 4 do not apply to any Gift falling within the prohibited categories specified in Clause 3(a), (b) or (c). Such Gifts must be refused in all circumstances.

Where the Gift is offered by someone and/or an organisation dealing or likely to have further dealings with the employee and/or CHCL, particular scrutiny is required. In such cases, the Gift must be refused unless the following conditions are met:

a. the Gift is of nominal value;

b. the Gift is offered openly to multiple recipients and not to the employee individually;

c. acceptance would not create an actual or perceived obligation; and

d. the employee has no direct decision-making authority over matters affecting the giver.

In all other cases, in deciding whether any item may be accepted or given, CHCL employees should consider the following criteria:

a. the Gift should be offered or given for an appropriate reason – it should be given clearly as an act of appreciation, and in the case of promotional expenditure, it should serve a bona fide business purpose;

b. there is to be no attached obligation or expectation of any favour in return, and there should be no intent to influence a decision or to begin a process with the ultimate aim of influencing decision-making – the Gift should be offered solely out of appreciation;

c. the Gift should be offered openly (and not secretly) and should be available to others, such as other employees or members of the public, where appropriate;

d. the Gift should not be viewed unfavourably by stakeholders if it were to be known to them;

e. the giving and receiving of Gifts between the giver and the employee should not be unduly frequent;

f. the offer and/or acceptance is in accordance with this Policy and conforms with the rules established by CHCL.

If the above criteria are not met, the employee should use his or her best endeavours to refuse the Gift in a professional manner.

5. Maintenance of Policy

The Managing Director of CHCL will ensure that compliance with this Policy remains a priority across the organisation and shall review and renew this Gift Policy as and when required.

Any query or question arising from this Gift Policy must be addressed to the Administrative Manager who may in appropriate circumstances seek relevant assistance including that of the CHCL Anti-Corruption Committee and/or the Managing Director of CHCL, if need be.

6. Internal Disciplinary Action

Failure to comply with any provision of this Gift Policy may result in disciplinary action and may, where applicable, constitute an offence under the relevant legislation.

7. Non-Compliance by External Parties

Non-compliance with this Gift Policy by External Parties, provided that the External Party has been notified of the Gift Policy in accordance with Clause 9, may result in contractual or legal action by CHCL, as deemed appropriate..

For the purcposes of this Clause 8, "External Parties" means clients, suppliers, contractors, consultants, agents, joint venture partners, any any other person or entity transacting with CHCl.

8. Communication

Management shall ensure that this Gift Policy is circulated to all employees.

Where appropriate, CHCL is further required to professionally inform clients, suppliers, contractors and any other stakeholders of this Gift Policy and the reason(s) for which the CHCL has adopted this Gift Policy. CHCL shall, where reasonably practicable, include in its contracts with External Parties an obligation to comply with the principles set our in this Gift Policy.

A copy of the Gift policy may be published on the website of CHCL for awareness purposes.

9. Approval

This policy has been approved by the Board of Directors on 28 May 2026.

Chairperson of the Board

28/5/26

Date