



POLICY

GIFTS AND HOSPITALITY



Beyond inspection

REVISION LOG / HISTORY

Revision	Prepared by	Date	Change Description
1.0	Ddary Gao	2023/10/10	New release





Beyond inspection

FOREWORD

(Not available)



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INTRODUCTION

Within the sphere of business affairs, the practice of presenting gifts and extending hospitality to business partners is a widely observed practice. These gestures serve to fortify the relationships fostered with business associates and professional contacts. However, it is essential to emphasize that STS, as an organization, upholds rigorous guidelines in this context. Both the act of giving and receiving gifts and hospitality may occasionally be interpreted as possible instances of commercial impropriety or bribery. Therefore, STS maintains a vigilant and watchful approach to oversee these matters, establishing clear rules to govern decision-making processes of our employees and business partners.

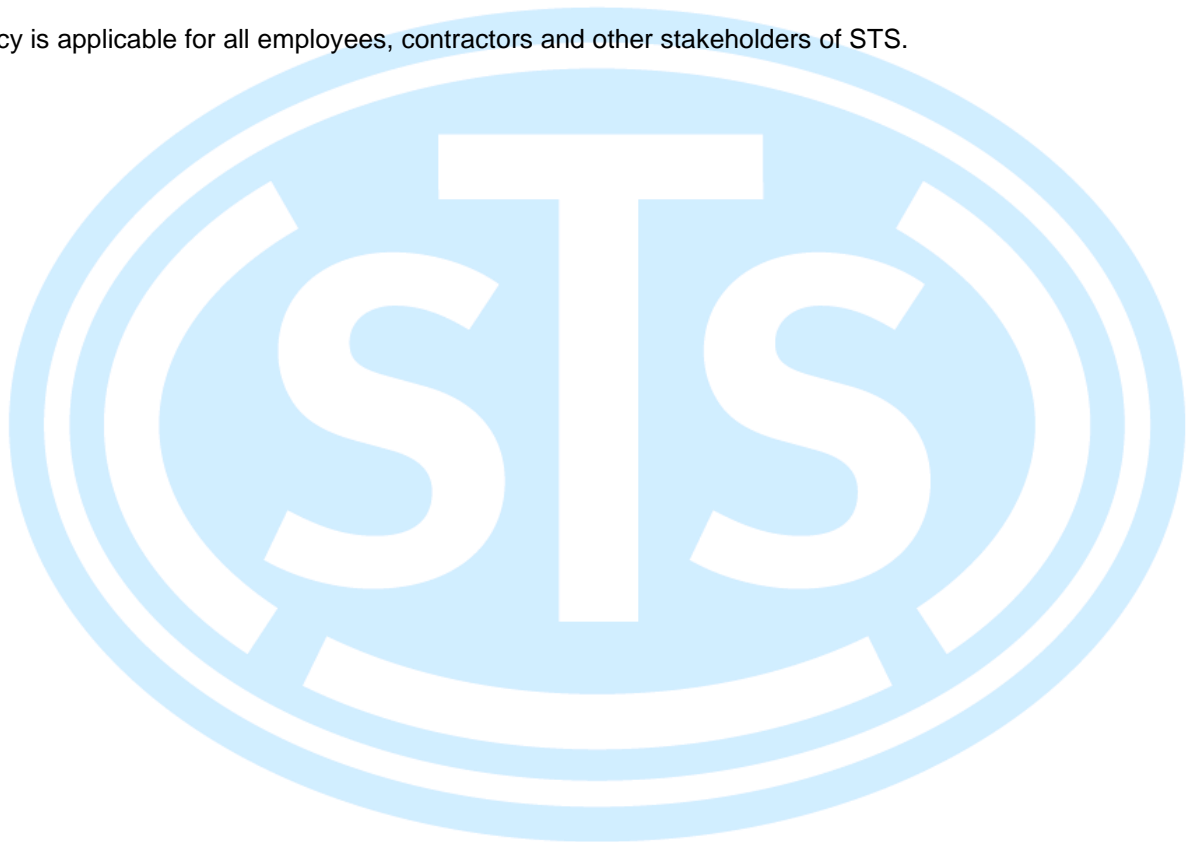


1 PURPOSE

This policy is established to ensure that employees of Senergy Technical Services Limited and its affiliated entities (hereinafter referred to as STS) comply with the laws and regulations surrounding gifts and hospitality, maintain ethical conducts and avoid the appearance of impropriety.

2 APPLICABILITY

This policy is applicable for all employees, contractors and other stakeholders of STS.



3 REFERENCES

00-POL-0001-EN	Whistleblower Protection Policy
00-POL-0020-EN	Compliance with Laws Policy
00-POL-0070-EN	Anti-corruption Policy
00-POL-1010-EN	Employee Code of Conduct



4 TERMS AND DEFINITIONS

GIFT

A gift means any form of payment, gratuity or advantage (monetary or otherwise), directly or indirectly offered or received (e.g., a donation, service, hospitality, favor, etc.).

HOSPITALITY

Hospitality means any form of entertainment.

ZERO-GIFT PRINCIPLE

The Zero-gift principle means that no gift, hospitality or other means of benefits can be received or offered by any means.





5 RESPONSIBILITIES

It is the responsibility of all STS employees to comply with the requirements of this policy and report any suspected or actual violations of this policy, including any corruption or illegal behavior.

It is the responsibility of STS to comply with laws in the country where it does business. STS shall offer training or explanation to all the employees to make sure that all employees understand the importance of gifts and hospitality.

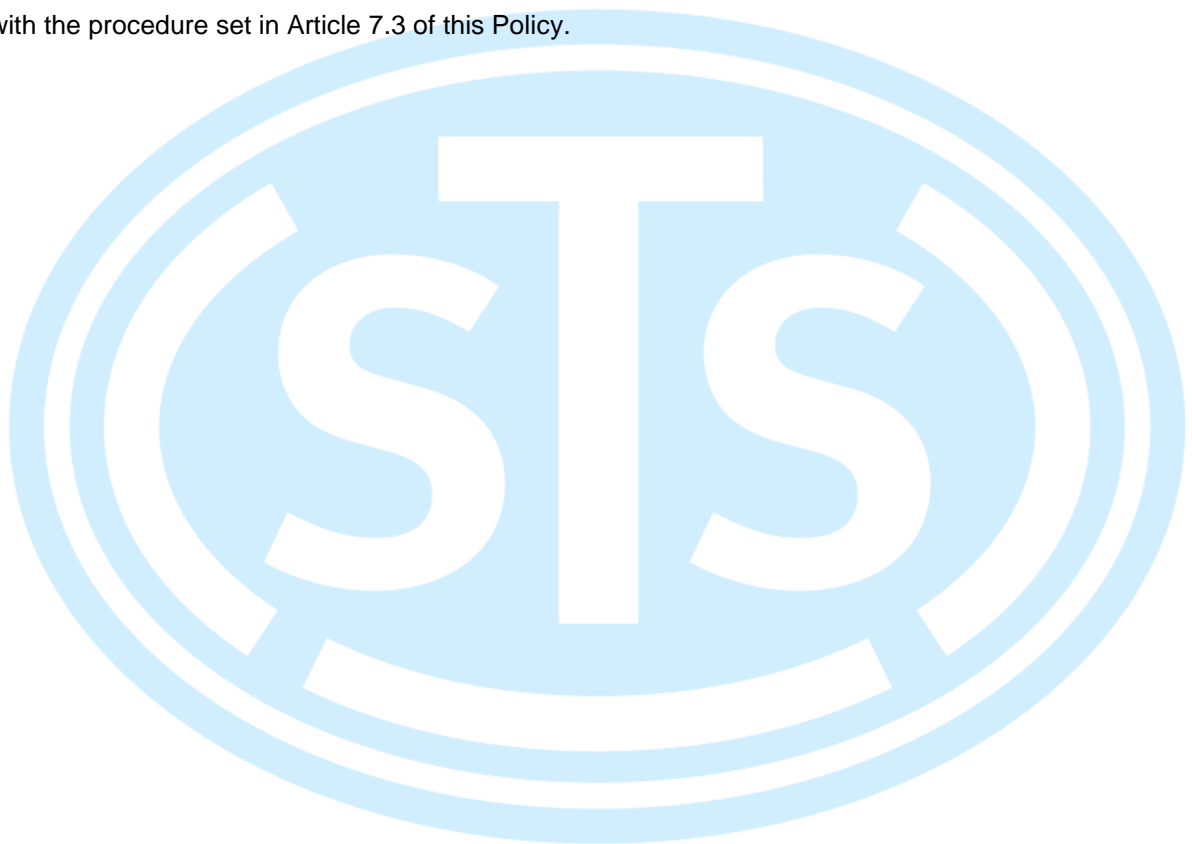


6 PRINCIPLES

Accepting an occasional small gift or invitation to a culture or sports event may be tolerated within the framework of business relations at some companies, but is not tolerated at STS.

These practices, including gifts or hospitality can be interpreted as a means of influencing a decision or may constitute an act of corruption. They can also lead to a conflict of interest.

At STS, offering gifts, hospitality or any other benefits may happen occasionally but always as organized by STS Marketing department, and strict abidance to STS policies. Receiving gifts, hospitality or any other benefits shall strictly comply with the procedure set in Article 7.3 of this Policy.



7 STATEMENTS / REQUIREMENTS

The Company expects all employees to comply with this policy. Any violations of this policy may result in disciplinary action, up to and including termination of employment.

7.1 GIFTS REQUIREMENTS

The Company has established a zero-gift principle, which is considered a critical part of ethics when working for STS.

As a service provider of conformity assessment services, an employee taking gifts no matter the amount will hardly justify his or her impartiality and independence when carrying out his or her professional duties. Therefore, the Company prohibits the receiving of gifts that are intended to influence business decisions or create the appearance of a conflict of interest.

The Company may provide gifts to clients or business partners that are consistent with normal business practices and companies with applicable laws and regulations.

7.2 HOSPITALITY REQUIREMENTS

The Company prohibits the receiving of hospitality that is intended to influence business decisions or create the appearance of a conflicts of interest.

STS employees may accept invitations to business-related events, such as conferences or trade shows, if the event is relevant to their job duties and the cost of attendance is reasonable. If an employee is invited to a business-related event that exceeds reasonable cost, they must report it to their supervisor and the Company's Legal, Compliance & Governance Manager.

The Company may provide hospitality to clients or business partners that is consistent with normal business practices and compliances with applicable laws and regulations.

7.3 COMPLIANCE PROGRAM

To ensure that all STS employees understand and adhere to the principles of gifts and hospitality, the following requirements must be met:

7.3.1 Prohibited conducts

STS employees shall not receive or end up receiving compensation of any kind, whether it benefits them or the Company, directly or indirectly. As such, STS employees shall act as follows:

- a) Invitation to entertainment activities shall not be accepted.
- b) Invitation to meals must be subject to direct supervisor's approval in writing and be reported within 12 hours.
- c) Gifts must not be accepted.

In the event the employee is in a position that makes it impractical to reject receiving a gift, he/she should report to STS Legal, Compliance & Governance Manager within 12 hours and send such items to STS local or regional office. Such items shall be collected by STS Legal, Compliance & Governance Manager and donated to non-profit organizations appointed by STS administration personnel.

7.3.2 Reporting

All employees, contractors and other stakeholders are encouraged to report any suspected or actual violations of this policy, including any illegal behavior.

Reports can be made anonymously, and whistleblowers will be protected from retaliation. The Company will investigate all reports of violations and take appropriate disciplinary action against any individuals found to have violated this policy.

For details, refer to the Whistleblower Protection Policy (00-POL-0001-EN) .

7.3.3 Enforcement

Any employee who violates this policy may be subject to disciplinary actions, up to and including termination of employment.

The Company reserves the right to take legal action against any employee or representative who violates this policy or applicable laws and regulations.

7.3.4 Training and communication

STS will provide regular training and communication to all employees, contractors and other stakeholders on gifts and hospitality policy, laws and regulations. This will help ensure that everyone understands their obligations and responsibilities to prevent and report improper behavior.

7.4 REVIEW AND REVISION

To ensure that the policy remains relevant and effective, STS shall conduct periodic reviews and control its revision process. Reviews shall consider changes to STS' operating environment, legal and regulatory requirements.

7.5 CONSULTATION

When in doubt as to how to resolve a contradiction between this policy and applicable laws, employees should seek guidance from the Legal, Compliance & Governance Department.