

APRIL 2024

# SPONSORSHIP AND DONATION POLICY



## GLOSSARY

<b>Agent:</b>	refers to any third party employed or contracted to represent the Company and/or to conduct or negotiate any business on behalf of the Company.
<b>AML CFT:</b>	refers to Anti-Money Laundering and Combating of the Financing of Terrorism framework, aimed at detecting, managing, and combating financial malpractices and crimes.
<b>Beneficiary:</b>	refers to the individual or legal entity, families, or groups in a situation of vulnerability or risk, being sponsored or granted a donation by the Company.
<b>Business Partner:</b>	means a third party with whom the Company has an investment or business arrangement.
<b>Company:</b>	<p>means any of the following companies:</p> <ul style="list-style-type: none"> <li>• AXIAN Support Services</li> <li>• <b>AXIAN Energy Cluster:</b> AXIAN Energy, AXIAN Energy Green, JOVENA, New Energy Africa (NEA), NEA Madagascar, WeLight, CGHV, GES, and any other affiliate;</li> <li>• <b>Open Innovation &amp; Fintech Cluster:</b> MVola, Telco Money, Free Money, TMoney, Nexta, Pulse and any other affiliate;</li> <li>• <b>Real Estate Cluster:</b> First Immo, SGEM and any other affiliate;</li> <li>• <b>Financial Services Cluster:</b> BNI Madagascar, Sanko and any other affiliate;</li> <li>• <b>AXIAN Telecom Cluster:</b> AXIAN Telecom, Telma, Telco Comoros, TRM, Free Senegal, Honora Tanzania PLC, Togocom, Connecteo, Towerco of Africa Ltd (TOA), Towerco of Africa DRC, Towerco of Africa Madagascar, Towerco of Africa Tanzania Limited and any other affiliate; and</li> <li>• Any other entity that is part of the current or future organizational structure of the Group, either by way of incorporation, merger or acquisition, joint venture, among others.</li> </ul> <p>Collectively referred as the 'Companies' or the 'Group'</p>
<b>Community:</b>	refers to a group of people who are geographically positioned in the areas of operation of the Company.
<b>Community Improvement:</b>	refers to Donation made to benefit a community in which the Company or the Group operates.
<b>Confidential Information:</b>	includes, without limitation, all business-related strategic documents as well as all personal information held on third parties, including Employees.
<b>Conflict of Interest:</b>	refers to a situation in which private interests are at odds with the Group's or Company's interests. A Conflict of Interest arises when a person performs a general interest function and his or her personal interests are in competition with the mission entrusted to him or her by his or her Company.

**CSR:** refers to Corporate Social Responsibility, and it relates to the Company's business approach that integrates social and environmental considerations into its operations and interactions with its stakeholders.

**Donation:** refers to the giving or providing of anything of value (such as goods, funds, space, or services) at no charge to a civic or charitable entity to support a charitable cause, benefit a social cause, serve the public interest, directly benefit a group or community, or otherwise generate goodwill on behalf of the Company, on its own name or the Group.

**Employee:** means any person hired by a Company of the Group and working full time, part time or on a casual basis, including interns and contracted staff, as well as its senior management officials and directors.

**Ethics:** refers to a behavior that is based on morality, seriousness, honesty and respect for all applicable rules and guidelines set out by the Group and adopted by the Company.

**Ethics Line:** refers to the Company's ultimate reporting line with the mandate to undertake a high-level investigation on complex matters, which may not be resolved by Local Compliance Officer/Champion. Matters shall be escalated to the Ethics Line through the Speak Up platform.

**Facilitation Payment:** means payments made to Public Officials to expedite performance of a routine, non-discretionary government action to which the company is legally entitled. It is sometimes called "grease payments".

**Improper Payment:** relates to payment made or received by an Employee of the Company as the inducements or anything of value for any reason in order to:

- Influence someone to use his/her discretionary authority;
- Influence someone's judgement about the Company's products and services or those of another company; or
- Gain an improper advantage when representing the Company's interests.

**Integrity:** means a behavior of honesty and absolute probity, without any ill intent and seeking the best interests of the Company.

**Non-Governmental Organization (NGO):** refers to a non-profit organization or entity not owned or controlled by any Government and Politically Affiliated Entity or Public Official, which seeks Donations for the purpose of either assisting underprivileged or underserved individuals or groups or supporting charitable or community causes.

**Personal Gain:** refers to any form of benefit, whether tangible or perceived, accruing, directly or indirectly, to an Employee or Business Partner, his or her family or close friends or business associates, not due in the normal course of the Employee's employment or contract with the Business Partner.

**Political Contribution:** refers to any financial contribution or the provision of goods, commodities, or services on a cost-free or discounted basis to political parties, politicians, campaigns, candidates, or political causes.

<b>Professional Conduct:</b>	means a set of ethical rules and duties that govern a professional activity. It defines the conduct of the Company's Employee practicing or conducting such business activities or transactions with its clients, Business Partners and other stakeholders.
<b>Public Official:</b>	means a natural person who is in a position of official authority that is conferred by a state, i.e. someone who holds himself out as authorised to act for or on behalf of or to represent a Government or a Governmental department or State-Owned Entity.
<b>Respect:</b>	means consideration of the value of someone or something; treating others with Respect and consideration, and not harming them physically or psychologically.
<b>Responsibility:</b>	refers to moral, intellectual and professional necessity to carry out and meet one's obligations and commitments.
<b>Senior Management</b>	refers to the upper echelon of executives within an organization who hold significant authority, responsibility, and decision-making power. These individuals typically occupy top-tier positions such as CEOs (Chief Executive Officers), COOs (Chief Operating Officers), CFOs (Chief Financial Officers), and other C-suite roles
<b>Sponsorship:</b>	refers to the act of making a monetary or in-kind contribution or providing goods, commodities, or services to a Business Partner, corporation, individual or group of companies and individuals in staging a sporting, artistic, or social event, in return for advertisement of the Group's brand. For avoidance of doubt, the hiring of Brand Ambassadors or Influencers shall not be considered a Sponsorship.
<b>Values:</b>	refers to the attributes defined and adopted by the Company to which the Employees must adhere. Defined Values shall be the reference points which shall guide the Employees in their daily work. The Company's Values include Boldness, Passion, Innovation and Commitment.

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## 1 INTRODUCTION

Adopting the Group's philosophy, the Company is strongly committed to the communities in which it operates. While charitable contributions are encouraged, all contributions must, however, be made in accordance with our high ethical standards and in compliance with all applicable laws.

Our CSR strategy needs to have relevance in 3 specific areas namely business priorities, Government priorities and stakeholder perception, in such countries in which the Company operates. It is however important that the provision of sponsorships or donations should not give rise to a perception of corruption and/or conflicting interests.

Consequently, all proposed Sponsorships and Donations provided by the Company must be compatible with its business activities and reflect our commitment to operating in an ethical manner. The purpose of this Policy is to establish the guidelines and control procedures that should be observed in the provision of Sponsorships and Donations by the Company. It sets forth a consistent process to ensure that Sponsorships and Donations are transparent and compatible with the Code of Ethics and Professional Conduct and Anti-Bribery and Corruption Policy.

This Policy applies to all Employees, as well as Business Partners of the Company. They are all expected to act and adhere to the guiding principles and procedures defined in this Policy. It requires all to maintain the highest of Professional Conduct in the handling of their affairs both in a professional and personal capacity.

In the event of any conflict between the provisions of this policy and applicable local laws, regulations, or ordinances under which the Company is governed, the latter shall prevail. If any provision of this policy is found to be invalid or unenforceable under applicable local law, such provision shall be severed from the policy, and the remaining provisions shall remain in full force and effect to the fullest extent.

## 2 GROUP CSR MANDATE

The Company may at the discretion of its Senior Management grant Sponsorships and Donations to eligible and honest entities, community and institutions that are motivated by legitimate reasons and/or projects in the following non-exhaustive areas:

- Promotion of health or disease prevention including health centers, outreach programs;
- Well-being and promotion of healthy habits, sport and human development including water, sanitation & hygiene programs, fight against drug abuse, children's social support projects, tournaments, etc;
- Education, culture, social development, and citizenship including schools, festivals, etc;
- Innovation and technology including accessibility to internet services, communication services, youth programs, financial inclusion;
- Sustainable development and socio-environmental responsibility including afforestation, exhibitions, green energy solutions, among others;
- Staging a sporting, artistic, or social event, in return for advertisement of the Group's brand.

For an effective management of the Company's CSR mandate, a set of guiding principles, as defined below must be adopted by the Company.

### 3 GUIDING PRINCIPLES

The following principles shall apply to any Sponsorship and Donation made by the Company:

- 3.1. All requests for Sponsorship or Donation must be formally addressed to the Chief Executive Officer of the Company, in such prescribed format and be submitted with all the required details. The Chief Executive Officer shall upon receipt of the request(s) channel same to the CSR Manager and Local Compliance Officer for further processing. While each request shall be assessed independently, only those requests which are aligned to the Company's strategic objectives and CSR mandate shall be considered.
- 3.2. The Company must take all the necessary steps to ensure that the Sponsorships and Donations are not used for improper purposes, such as influencing a Public Official or perceived as an act of favoritism, or the beneficiary(ies) is/are identified as being not fit and proper to deal with (in accordance with the AML CFT laws).
  - 3.2.1. Consequently, any request/proposal for donation or sponsorship must be made in writing and the proposal along with the profile of the beneficiaries must be properly assessed by the local compliance officer/champion, with consultation with the CSR Manager.
  - 3.2.2. Depending on the nature of the proposed project, the CSR Manager shall initiate further discussions with other executives of the Company (technically from the Human Resources (regarding employee engagement), Finance, Accounting, Legal, Procurement, Communication and/or Marketing department).
  - 3.2.3. In line with the company's philosophy to adhere to recommended Environmental and Social (E&S) protocols, and to ensure compliance among its collaborators, any proposals for sponsorships and donations that may have an impact on the environment and social aspects must undergo both pre- and post-impact assessments by the E&S team, either at the company or group level.
  - 3.2.4. Based on his discussions, the CSR Manager shall document his findings and observations, to be tabled to the Company's Senior Management for decision making. Further details on the approval process are provided in Section 4: 'Procedures to review/approve a donation/sponsorship' below.
- 3.3. All Sponsorships and Donations must always be done in good faith, in a transparent manner and strictly in accordance with applicable legislations, the provisions set out in the Company's Code of Ethics & Professional Conduct and the other relevant internal policies. Per se, for an effective monitoring, all decisions and implied transactions must be duly recorded by CSR Manager, upon validation from the Local Compliance Officer. See below section on record keeping for more details.
- 3.4. No Sponsorship and Donation must be made in conjunction with, as part of, or in relation to the negotiation of any bid, tender, contract renewal, obtaining licenses/permits or prospective business relationship with parties associated with the receiving individual or entity.
- 3.5. While Employee Driven Charity is allowed by the Company, all contributing and participating Employees must ensure that their actions are legitimate. They are required to make a formal written declaration to the CSR Manager, confirming that the Company is not directly or indirectly engaged or linked in the said charity event. Nevertheless, such an Employee Driven Charity may be subject to a compliance screening and approval from the local compliance officer/champion, with specific recommendations and conditions, upon consultation with the Human Resources Department.
- 3.6. The Company, however, forbids any of its Employees to provide any Sponsorship or Donation on its behalf or on behalf of the Group in the course of his/her employment.
- 3.7. For an effective monitoring of the transactions relating to the proposed Sponsorship and Donation, the CSR Manager and the Local Compliance Officer must ensure that all the relevant details and decisions are properly recorded and reported to the Company's Senior Management or Board, as and when required.

- 3.8. In line with the principle 3 of the Company's Anti-Bribery and Corruption Policy, any Sponsorship or Donations to or involving a Public Official, a State-Owned Entity, or the Government:
- 3.8.1. Must be subject to an enhanced due diligence screening by the local compliance officer/champion, in consultation with the Group Legal and Compliance and Regulatory team;
  - 3.8.2. Must be formalized in the form of a written engagement to be executed by both the remitter and beneficiary, or otherwise, depending on the nature and timing of the engagement, the local compliance officer/champion and CSR Manager shall document their observations and must obtain the approval from the Company's Senior Manager;
  - 3.8.3. Must be approved by the Company's Senior Management, who may relative to the nature of the transaction seek approval from the Group; and
  - 3.8.4. The said engagement must always be transparently documented and disclosed in accordance with applicable policies.

### 3.0.1 PERMISSIBLE SPONSORSHIPS AND DONATIONS

The Company may sponsor events or activities hosted, coordinated, or supported by its Business Partners.

Sponsorships include any financial contribution or contribution in-kind towards an event organized by a Business Partner, in return for the opportunity to advertise the Company's brands, including, without limitation, displaying Company-registered logos or publicizing our trade brands during an event (i.e., mentioning the Company/Group's support during the opening or closing of a conference).

Subject to prior approval from Senior Management, the Company may consider and make the following categories of Sponsorships and Donations:

- Reasonable, in-kind Donations of goods (including Sponsorships paid via goods).
- Sponsorships and Donations permissible under local law, made in good faith, customary and reasonable under the circumstances, and which do not improperly benefit an individual person or Public Official, directly or indirectly.
- Sponsorships and Donations that do not create the appearance of bribery or any other unethical conduct. Donations must only be given for charitable purposes, to benefit a social cause, to serve the public interest, or for the common good, and cannot be used to obtain or retain business, or in any other form that could, if misinterpreted, constitute or give the impression of bribery.
- Sponsorships and Donations that add value to business activities.

For further details on the review and approval procedures, see Section 4 below.



### 3.0.2 PROHIBITED SPONSORSHIPS AND DONATIONS

Certain categories of Sponsorships and Donations are highly susceptible to misappropriation and improper recordkeeping. The following Sponsorships and Donations are prohibited in all circumstances:

- Sponsorships or Donations made in physical cash or currency;
- Sponsorships or Donations made in gift cards;
- Sponsorships of or Donations to fraternal, labor, or religious organizations that only serve the interests of their members;
- Donations to an individual, especially someone identified as a Public Official, other than emergency Donations to victims and first responders;
- Sponsorships of or Donations to state-owned entities or parastatal bodies that could be perceived as an effort to directly or indirectly influencing business decisions or that create the impression of bribery;
- Non-permissible activities such as activities that are detrimental to public health or safety, activities that promote or encourage unhealthy lifestyle e.g. smoking, alcohol or any substance abuse, activities which may cause widespread public controversy, activities which may compete with the Company's existing project or event, activities organized by political parties and/or activities that promotes political agenda, activities which are likely to raise a Conflict of Interest;
- Sponsorships or Donations to existing or new Business Partners that have been found to engage in corruption or other unethical conduct;
- Sponsorships or Donations involving organizations or individuals that practice discrimination by race, creed, color, sex, national origin, sexual orientation, or any other personal attributes;
- Adverse report or lack of due diligence documents on the Beneficiary;
- Sponsorships or Donations to such Business Partners whose goals are incompatible with the Company's corporate principles or which may cause damage to the Company;
- Request for Sponsorships and Donations is not reasonable in value and frequency or shall potentially cause a breach of the applicable laws, rules, internal policies and regulations;
- Such requests for Sponsorships and Donations are deemed to be in contradiction to the recommended Environmental and Social (E&S) protocols and shall cause harm to the ecosystem and stakeholders.

For further guidance regarding what constitutes an appropriate Sponsorship or Donation, please consult the Company's Local Compliance Officer or Champion.

### 3.0.3 POLITICAL CONTRIBUTION

The Company is politically neutral and is not directly or indirectly affiliated with any political party and does not provide services linked to any political messages. Adopting the Group's philosophy, the Company prohibits its Employees from contributing the Company's funds, time, or assets to politicians, candidates for political office, political parties.

Should an Employee of the Company or any existing or new Business Partner participate in a political process, he/she must make it clear that his/her involvement in the political activity reflects his/her own private individual beliefs, views, and actions and not that of the Company and/or that of the Group.

The Company prohibits its Employees from making Political Contributions on the Company's behalf or as a representative of the Company, regardless of the level of authority.

Employees and Business Partners must not use their position within the Company to coerce or put pressure on other Employees or Business Partners to make political contributions or support or oppose any political candidates or parties.

## 4 PROCEDURES TO REVIEW & APPROVE A DONATION OR SPONSORSHIP

- 4.1. Any request for Sponsorship and/or Donation must be made by the requesting party or potential Beneficiary, in the prescribed Donation/Sponsorship Form (See Annex 1&2) and must be formally addressed to the Company's Senior Management.
- 4.2. Upon receipt of the request, the Company's Senior Management shall channel the same to the CSR Manager and Local Compliance Officer for review purposes. The CSR Manager shall have the responsibility to check whether the request is aligned to the Company's CSR mandate while the Local Compliance Officer shall initiate an independent screening of the concerned parties.
- 4.3. The Local Compliance Officer and CSR Manager shall jointly prepare a memo, with details on the request, amount, identified beneficiary/ies and their preliminary observations, within ten (7) working days from the date the request was received, and they shall consult other executives from relevant departments within the Company, namely Human Resources, Legal, Communication or Marketing.
- 4.4. Technical assistance from the Regulatory and E&S team is also envisaged to look at the implied regulatory and E&S risk to which the Company may be exposed on being associated with the said project and/or the beneficiary/ies.
- 4.5. Post discussion and deliberation among the internal executives, the CSR Manager shall within the next 48 hours from the date on which the consultation took place, prepare a brief on the discussions and deliberations, which shall be tabled to the Company's Senior Management for ultimate approval.
- 4.6. Approvers shall include the Company's Chief Executive Officer and Chief Finance Officer, and/or such Employees being entrusted similar responsibilities. Approvers may, depending on the nature of the donation and sponsorship, solicit further assistance from executives at the Group level (inclusive of the Group General Counsel, the Group Regulatory Director, the Group Marketing or Communication Director, the Group Finance Officer, Group CSR Manager, Group Impact Director), or include them as additional approvers.
- 4.7. Once the request/proposal for sponsorship or donation is approved by the Company's Senior Management, a contract or memorandum of understanding (MoU) will have to be signed between the Company and the Beneficiary/ies, outlining the applicable terms and conditions, inclusive of an ongoing E&S impact assessment (as shall be applicable) and disclaimer that there shall be no implied privileges for either party outside this engagement.
- 4.8. Should the request/proposal be rejected by the Company's Senior Management, the requesting party/ Beneficiary shall be notified in writing by the CSR Manager.
- 4.9. All payments shall be made by the Company's Finance team and must be via bank transfer to the Beneficiary's shared bank account only. No payment shall be made in cash nor to bank accounts other than the one provided by the Beneficiary.
- 4.10. In addition to a register of Sponsorships and Donations (assessed, approved, or rejected) to be maintained by the Company's CSR Manager, the Finance team shall for reconciliation purposes, keep records of the approvals, receipts, invoices, and other documents related to the Sponsorship and Donation.
- 4.11. Moreover, in line with the corporate governance principles, the Company's accounting team must ensure that all approved and executed Donations and/or Sponsorships are disclosed in the Company's annual report.

#### 4.0.1 EMERGENCY DONATION

In cases of natural calamities, in-kind donations such as food, water, clothes and first aid supplies may be offered by the Company to an NGO and/or directly to victims and/or front-liners with the aim to meet humanitarian needs.

However, prior to making any emergency donation on behalf of the Company, the CSR Manager must consult the Company's Senior Management and obtain its go ahead.

For an effective processing and monitoring process of emergency donations, a written approval (at least by email or WhatsApp) of the intended initiative is required. Moreover, for effective record keeping, the CSR Manager must relative to the emergency donation provide all the relevant invoices and receipts to the finance and accounting team in a timely manner for reconciliation purposes.

## 5 CONTRACT MANAGEMENT

All engagements by the Company for a Sponsorship and Donation must be made in writing, with detailed terms and conditions, as validated by the Legal team, and a description of the planned use of the funds to be remitted by the Company.

If a potential Beneficiary refuses to execute the contract proposed by the Company or the Company has reasonable ground to believe that the actual terms of the engagement are not being adhered to, the approved Sponsorship or Donation shall be void with immediate effect, with no further payment to be effected by the Company, until the matter is sorted up to the satisfaction of the Company's Senior Management.

## 6 RECORD KEEPING

Given the defined process to receive, assess and approve a Sponsorship and/or Donation, the Company's CSR Manager and the Local Compliance Officer must at all times ensure that all the relevant documents related to Sponsorships and Donations, all completed forms, compliance findings/observations, approvals or rejections, executed contracts and other relevant documents or information records are available on records for at least seven

(7) years after the date on which the transaction was completed.

A detailed 'Sponsorship & Donation Register' bearing the key information is to be maintained by the Company's CSR Manager and be shared with the Local Compliance Officer/Champion (as and when requested) and be made available for audit purposes and internal reporting purposes.

Donations and Sponsorships shall be duly accounted for in the Company's accounting records, through a specific and self-explanatory note of the funds spent. All transactions made pursuant to this Policy are made in a timely manner by the Finance team and are clearly communicated to the accounting team for reconciliation purposes. For more information about the Company's accounting and finance policies and procedures, please contact the Finance team.

## 7 TRAINING

All Employees directly involved in this process shall receive appropriate training. To this end, the Local Compliance Officer or Champion, supported by the Group Legal & Compliance team, shall be responsible for organizing relevant training sessions (face to face or online).

Such sessions shall be repeated, as often as necessary to sensitize the Employees of the guiding principles and ethical practices. Attendance of such training sessions shall be mandatory, and the Local Compliance Officer or Champion shall keep appropriate records of all trainings undertaken.

## 8 VIOLATIONS

The granting of any Sponsorship or Donation in disagreement with the guidelines provided for in this Policy will result in the immediate cancellation of the Sponsorship and/or Donation and will subject the employee involved in the application to disciplinary measures including termination of employment for misconduct as provided for in the relevant Policies.

Any circumstance that requires exceptional consideration can be approved at the discretion of the Senior Management of the Company, upon consultation with the relevant persons at Group level. The Local Compliance Officer or Champion must however maintain a record of all the approved exceptions to this Policy, for at least seven (7) years post the transaction.

Moreover, any violation of this Policy by an Employee shall be deemed serious and will be considered as such in any disciplinary proceedings including termination of employment for misconduct. It will be dealt with under the terms of the applicable disciplinary procedures as well as appropriate legal action and the immediate termination of any working or business arrangements.

## 9 REPORTING

In the case of any suspected activity or improper behavior by/or on behalf of the Company or the Group, Employees and Business Partners may use any of the below options for an investigation to be initiated:

- a. Contact the Company's Local Compliance Officer or Champion; or
- b. Report the matter to Ethics Line via the Speak Up platform, with a minimum description on the triggering event; or
- c. Report to the country- specific authority in respect to such cases.

## 10 AMENDMENTS, REVIEWS AND CONTROLS

The Group Legal & Compliance team shall, in consultation with the Group CSR team will monitor the effectiveness of existing procedures for the implementation of this Policy. Changes may be made to this Policy to reflect evolving norms and practices in the industry in which the Company operates.

- Every three years from the last approval date.
- Material audit findings/ gaps in the Policy.
- Major cases of violations of this Policy, measures taken and need for additional measures to be implemented.
- Recommendations of auditors.
- Changes in the economic, legal, regulatory and social environment.
- The addition of new business activities or the Company's presence in new, more sensitive markets.

## 11 RELATED DOCUMENTS

- Code of Ethics & Professional Conduct
- Supplier Code of Conduct
- Anti-Bribery and Corruption Policy
- Gift & Hospitality Policy
- Conflict of Interest Policy
- Anti-Money Laundering Policy
- Fraud Management Policy
- Investigation Policy
- Whistleblowing Policy
- Third Party Management Policy

## ANNEX 1 - SPONSORSHIP APPLICATION FORM

### DETAILS ON SPONSORING EVENT

Description of sponsoring event:

Sponsorship amount:

Purpose/Uses of sponsorship:

Date of the sponsoring event:

Origin of sponsorship:

(e.g., referred by an Employee or by a known Business Partner – to specify name of referrer)

Performance frequency and Number of performed events:

### DETAILS ON THE BENEFICIARY

Full Name:

Contact details:

Has the beneficiary received other sponsorship from the Company within the last 2 years?

Yes  No

If yes, please describe the prior sponsorship(s):

Is the beneficiary a Public Official or state-owned entity or parastatal body?

Yes  No

Does the beneficiary or any of its related principals have any business or business-related decision pending with the Company? (e.g., a contract, application, tender, approval, license, permit, etc.)

Yes  No

If yes, please provide full details regarding the pending business:

Are you aware of any competitor of the Company who is also sponsoring this event?

Yes  No

If yes, please provide relevant details:

Is there any other beneficiary/ies who received similar sponsorship(s) from the Company previously?

Yes  No

If yes, please describe the most recent sponsorship(s), including the value and date received:

Please describe the proposed sponsorship agreement:

(e.g., key terms and conditions, including how this sponsorship will benefit the Company and its stakeholders)

## INTERNAL REFERENCE

Name of Employee completing this form:

Title or Position:

Department/Business Unit:

Signature & Date:

## REVIEW & APPROVAL

	Name	Position	Sign & Date
CSR Manager			
Local Compliance Officer			
Senior Management – Executive			
Group General Counsel (if needed)			
Group Regulatory/Impact Director (if needed)			

Please attach to your completed form:

1. a copy of the letter from the Recipient requesting the sponsorship; and
2. a copy of the response letter to the recipient of sponsorship

## ANNEX 2 - DONATION APPLICATION FORM

### DETAILS ON THE DONATION

Purpose of the donation:

Expected date for the donation:

Purpose/Uses of sponsorship:

Origin of donation:

(e.g., Are you aware of any competitor of the Company who is also sponsoring this event?)

Value of donation:

Please list the names of any other Employees participating in the Donation:

### DETAILS ON THE BENEFICIARY

Name of beneficiary/ies:

Contact details:

Describe the nature of business/profile of the beneficiary:

Does the Beneficiary or any of its related principals have any relationship with a Public Official or state-owned entity or parastatal body?

Yes  No

If yes, please provide full details:

Will any Public Official or state-owned entity or parastatal body or political party benefit from the donation, directly or indirectly?

Yes  No

If yes, please provide full details:

Does the beneficiary have any business or business-related decision pending with the Company?  
(e.g., a contract, application, tender, approval, license, permit, etc.)

Yes  No

If yes, please provide full details regarding the pending business:

List other beneficiaries of the donation and how they will benefit:



Are you aware of any competitor of the Company who is also sponsoring this event?  Yes  No

If yes, please provide relevant details:

Has the beneficiary received other donation(s) from the Company within the 2 years?  Yes  No

If yes, please describe the prior donation(s), including the value and date received:

Is there any other beneficiary/ies who have recently received similar donation(s) from the Company  Yes  No

If yes, please describe the recent donation(s), including the value and date received (Max 3):

Please describe the proposed donation agreement:  
(e.g., key terms and conditions, including how this sponsorship will benefit the Company and its stakeholders)

## INTERNAL REFERENCE

Name of Employee completing this form:

Title or Position:

Department/Business Unit:

Signature & Date:

**REVIEW & APPROVAL**

	<b>Name</b>	<b>Position</b>	<b>Sign &amp; Date</b>
CSR Manager			
Local Compliance Officer			
Senior Management – Executive			
Group General Counsel (if needed)			
Group Impact Director (if needed)			
Group Regulatory Director (if needed)			

Please attach to your completed form:

1. a copy of the letter from the potential Beneficiary requesting the donation; and
2. a copy of the response letter to the Beneficiary of donation.