



DOCUMENT DETAIL

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DOCUMENT CLASSIFICATION

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Confidential	
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**DOCUMENT REVISION HISTORY**

REV NO.	DATE	REVISION DETAILS	AUTHOR
0.0	01/06/2018	New Document	Global Director, Legal
1.0	31/07/2020	Inclusion of the sentence 'In the event of a conflict between this policy and local laws, local laws will prevail.'	Global Director, Legal
2.0	21/06/2024	<ul style="list-style-type: none"> Streamlined document format with MGMT. Changed the document process owner title due to business realignment. Update Division reference to reflect current organisation structure. Rename Audit and Risk and Management Committee ("ARMC") to Audit Risk and Sustainability Committee ("ARSC") Section 3: Scope - amend sentence of "In the event of a conflict between this policy and local laws, local laws will prevail." to "In the event of a conflict between this policy and local law, contact The Legal & Integrity department of AET immediately. As a general rule, AET will apply whichever is stricter and always on the basis that AET remains in full compliance with applicable laws." 	General Counsel & Chief Integrity Officer



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1.0 Language Convention

In this document, the use of:

- The word "shall" indicate a course of action that is required or mandatory. The English language equivalent or interchangeable term for "shall" is "must",
- The word "should" indicate a preferred course of action,
- The word "may" indicate a possible course of action.

2.0 Objective

AET is committed to maintaining the highest levels of corporate ethics as set out in AET's Code of Business Conduct and Ethics. As part of this commitment, all AET's relationships must be based on integrity and sound business decisions. Alongside the AET Anti-Bribery and Corruption Policy, this Policy aims to set out when it is acceptable for Employees to give and receive gifts and corporate hospitality.

3.0 Scope

This policy applies to all jurisdictions in which AET operates and covers all individuals working on shore and off shore at all levels and grades on behalf of any company within the AET Group without exception in any capacity whatsoever, including without limitation, the senior management team, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as "Employees" throughout this policy).

This policy does not form part of any Employee's contract of employment and AET may amend it at any time.



In the event of a conflict between this policy and local law, contact The Legal & Integrity department of AET immediately. As a general rule, AET will apply whichever is stricter and always on the basis that AET remains in full compliance with applicable laws.

4.0 'No Gift' policy?

To avoid a conflict of interest or the appearance of a conflict, AET has adopted a **'No Gift'** policy. This means that, subject to some narrow exceptions set out in this policy, Employees are not allowed to receive gifts from vendors, suppliers, customers, potential employees, potential vendors or suppliers, or any other individual or organization.

5.0 Provision of gifts

Generally, Employees are not permitted to provide gifts to third parties, except with the permission of their Head of Department.

6.0 Exceptions to the 'No Gift' policy

AET permits the giving and receiving of gifts in the following limited situations:

- Exchange of gifts between companies;
- Commemorative gifts at official AET functions;
- Internal recognition gifts between AET and its Employees;
- Charitable donations (made in accordance with the AET Anti-Bribery and Corruption Policy)



This policy does not apply to promotional gifts, such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. Standard AET promotional corporate gifts or gifts given within the AET Group are also exempted from this policy.

7.0 Provision and acceptance of a corporate hospitality

Corporate hospitality is an accepted part of conducting business and as long as it is reasonable, proportionate and infrequent it is not likely to breach global anti-bribery legislation. However, corporate hospitality which could be seen as excessive or lavish or hospitality accepted by or provided to someone other than AET Employees (such as family members) could be illegal.

AET appreciates that the practice of giving corporate hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. When deciding on the appropriateness of giving or receiving corporate hospitality, Employees should exercise common sense and caution, keep their Line Manager updated and consider the following:

- a. how it compares in value to the usual hospitality practices in the applicable industry and country;
- b. whether it is permitted under local laws and customs;
- c. whether it has been given and received in good faith;
- d. the total value of hospitality to or from that person or entity in the current financial year;
- e. the suitability of the hospitality given the Employee's position at AET; and
- f. whether an objective party would consider the hospitality to be reasonable.

Corporate hospitality which, in accordance with the terms of this Policy, is considered reasonable and proportionate may be given or accepted however Employees must adhere to the reporting requirements set out in this Policy.



8.0 Return of Gifts

If an Employee receives a gift they should inform their Line Manager immediately, make a report of the gift on the AET Gift and Corporate Hospitality Register and return the gift to sender with a polite and courteous note advising the sender of AET's 'No Gift' Policy and requesting that such policy be respected in the future.

AET is aware that the exchange of gifts can be a delicate matter in some cultures or situations and that to return a gift may cause serious offence and/or seriously damage the business relationship between AET and the sender. In these very limited situations, Employees are expected to immediately inform their Head of Department and seek permission to retain the gift. A report of the gift should be made on the AET Gift and Corporate Hospitality Register.

Even if it may appear disrespectful, permission to retain the gift should **not** be granted by a Head of Department in the event that any conflict of interest exists (as defined in the AET Conflict of Interest Policy) and the gift should be returned with a polite and courteous note of thanks.

Any gift authorised for retention by a Head of Department should be given to the Human Resources department for safe keeping. The Head of Department should confirm if the gift is subsequently to be:

- donated to a recognised charity;
- auctioned internally, with the proceeds being donated to a recognised charity;
- or
- permitted to be retained by the Employee.

9.0 Reporting

Any gift or any corporate hospitality whether given, received or declined which exceeds the equivalent of **US\$100** in value per event, must be recorded on the AET Gift and Corporate Hospitality Register (which is available on the Bridge) within 5 business days of offer, acceptance or decline.



Failure to report within the designated time is likely to be considered as a disciplinary offence.

AET understands that it will not always be easy to assess the value of corporate hospitality which is received. In these situations, Employees should describe hospitality and make an educated estimate of its likely value.

It is recognised that there may be occasions when the value or form of the hospitality an Employee gives or receives is much greater than had been anticipated prior to receipt and may ultimately be perceived as unreasonable. If this happens you should ensure that the transaction is recorded on the Gift and Corporate Hospitality Register and inform **The Legal & Integrity department of AET** immediately.

10.0 Restrictions on gifts and corporate hospitality

In order to avoid any suspicion of wrongdoing, Employees should not engage in the following conduct or activities:

- Employees should not provide gifts to, or receive them from, Government offices (or their close families and business associates) regardless of the value except with the express permission of the CEO.
- Employees should politely decline any offer of Corporate Hospitality which may be considered lavish or excessive or the theme of which may be considered inappropriate.
- The giving or receiving of money or cash equivalents such as gift cards, certificates or vouchers is prohibited.
- Employees should not accept any corporate hospitality where a representative of the company offering the hospitality will not be accompanying the Employee to the event.



11.0 Your Responsibilities

It is every Employee's responsibility to ensure that they understand and comply with the terms of this Policy. Should you be in any doubt as to how to proceed in a particular circumstance the matter should be referred to **The Legal & Integrity department of AET** **before** offering or accepting any corporate hospitality.

12.0 Review of procedures and training

AET will provide training to all Employees on induction and on a regular basis thereafter. The level of training an Employee receives will depend on the specific risks associated with their role.

If an Employee considers that they would benefit from refresher training, they should contact the Human Resources Department.

13.0 Confidential Reporting

AET expects and requires any Employee who has knowledge of, or reason to suspect, any violation of this Policy to contact their Line Manager or **The Legal & Integrity department of AET** immediately. Employees may also utilise the reporting procedure set out in the AET Whistleblowing Policy.

14.0 Audit Committee Review of Reports

A summary of reports received under this Policy may be communicated to the **Audit Risk and Sustainability Committee**.



15.0 Consequences of Non-compliance

Non-compliance with this Policy could have serious consequences for AET, including civil/criminal penalties, court injunctions, loss of customers and reputation damage.

Any Employee who breaches this policy may be individually subject to civil/criminal penalties and may face disciplinary action, which could result in dismissal for misconduct.