

GIFTS AND HOSPITALITY POLICY

1. Scope

This policy applies to all permanent and temporary employees of Colvin Limited (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("*associated persons*"). All employees and associated persons are expected to adhere to the principles set out in this policy.

The Company reserves the right to review, revise, amend or replace the content of this policy, and introduce new policies from time to time, to reflect the changing needs of the Company and to comply with changes to legislation.

2. Policy Statement

This policy is designed to help encourage all employees to refrain from accepting gifts and hospitality except in the very limited circumstances outlined in this policy.

The purpose of the Gifts and Hospitality policy is to set out and clarify the circumstances in which gifts and hospitality need to be declared and may or may not be accepted.

Our aim is to ensure that when dealing with situations under this policy, individuals feel that they have been treated fairly and consistently, whatever the outcome. It is important that the Company can demonstrate that any decisions and practices are fair and reasonable, having followed the Company's procedures and legal best practice to the full.

This policy is designed to support line managers in following the Company's procedures in order that they ensure their teams achieve and maintain organisational standards. The policy is also designed to provide Employees with an understanding of the procedures and how they will be applied.

This policy encourages line managers to treat all Employees objectively and consistently at all times.