



Corporate Policy Document

Events & Hospitality Code

Version – 1.1

WMS Group Companies
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TABLE OF CONTENTS

DOCUMENT HISTORY

Version	Author	Approver	Date
1.1	P Bhattacharya	Divya Kulshreshta	19-9-2019

1.0 Anti-Bribery Policy Statement

This policy is designed to give guidance on the types of entertainment which may be given and accepted by staff, vendors and contractors of WMS Group of Companies [WMS Agents], so that no member representing WMS can be alleged to have acted unfairly in business dealings or been party to any form of bribery. This policy document is complimentary to WMS's Code of Anti Bribery and should be read together as necessary. [Specific References to be made to Sections – 7, 8 and 9 of Anti Bribery Code].

This policy seeks to protect staff and business associates like Vendors and contractors from allegations of impropriety by ensuring that the offer and acceptance of substantial corporate hospitality is transparent approved and recorded. Any queries on interpretation of the policy should be addressed either to the immediate supervisor and/or to the designated Anti Bribery Officer of WMS. WMS Staff and Business associates covered under this policy should never accept benefits of any kind from an operator, supplier or client which might be seen to compromise their judgment or business behaviour.

This policy is designed to give guidance about how entertainment may be interpreted. It is not intended in any way to prevent informal contacts between WMS staff, clients and business associates. Good working relationships are crucial to our business and are encouraged. However, all concerned who are representing WMS, should use a “common sense” approach in accepting or offering gifts or invitations.

Please note that WMS companies globally (collectively the “Group”) is committed to complying with all laws and regulations that govern its operations in every country in which it operates. This Anti-Bribery Policy (the “Policy”), which normally defines and moderates Events & Hospitality also, presents individual's responsibility to comply with anti-bribery and anti-corruption laws around the world and to ensure that any third parties that we engage to act on our behalf, do the same.

Corporate Policy Document – Events & Hospitality Code

WMS has a zero-tolerance policy towards bribery. Even the suggestion of corruption may damage the reputation of the Company and affect its ability to do business, as well as the reputation of its employees. The Group is committed to doing business ethically, even if it results in not gaining new business, not using services of particular agents, business partners or incurring delays in carrying on business.

2.0 Scope of Policy Statement

The principles and obligations outlined in this Policy apply to all employees of WMS companies globally, members of WMS's Board of Directors, and WMS's contractors (which include agents, consultants, outsourced personnel and other representatives). As such, each individual is responsible for adhering to these standards in all business interactions, and must ensure that all Company contractors retained also understand that they are responsible for complying with this Policy when acting on behalf of the Company.

This Policy sets forth WMS minimum compliance standards with respect to interactions with third parties. However, where local law, regulations or local or Business Unit internal policies require more stringent controls, then such more stringent controls must be followed. It is the responsibility of each local Business Unit to identify and strictly adhere to such additional local/ Business Unit requirements and controls.

3.0 Events, Hospitality & Gifts Offered by WMS Agents

3.1 Hospitality Offered: Events & Meetings

Corporate hospitality, the sponsorship of events and exhibitions and the distribution of promotional items are useful ways of networking and raising awareness of WMS's services. In particular, WMS hosts a number of business events each year. Invitations to such events will not be made conditional upon agreement of a business transaction or subject to contracts of a particular value being awarded to WMS. **No invitations may be issued to**

Corporate Policy Document – Events & Hospitality Code

corporate, government or public sector clients during a competitive tender process.

Guest lists will be prepared carefully so that invitations do not become automatic. Clients and business contacts should not feel that they are entitled to attend WMS events by virtue of a long standing relationship or a history of high value business between the parties.

If a meeting is arranged overseas with a new business contact, WMS staff should confirm clearly in advance who is attending the meeting and if there is any social element to the meeting, such as drinks or a dinner. The meeting arrangements should be approved by a Director and records maintained of all details relating to the meeting.

WMS staff may not authorise their own business entertainment expenditure. Expenses claims must be signed off by a Director whose authorisation limit covers the total cost of the entertainment provided. Where more than one member of WMS staff is present when business entertainment costs are incurred, the bill must be settled by the most senior individual, who should then submit an expenses claim for approval in the normal way.

3.2 Corporate Gifts

Corporate gifts sent on behalf of WMS Group will be ordered and dispatched through Administration department and will be recorded. Smaller gifts may be sent by individual members of staff on behalf of the Company to personal business contacts on significant occasions such as Eid, a family celebration or on retirement. Such gifts must always be approved by a Director, should include an explanation of why the gift has been sent and should not exceed USD 100 in value. In case the gift's value exceeds USD 100, the same should be approved by the Board of Directors prior to sending the gift.

3.3 Corporate Sponsorship

Corporate Policy Document – Events & Hospitality Code

WMS will not sponsor individual causes or charitable events. Charity payments may only be made directly to registered charities and will be recorded in Group accounts. Sponsorship opportunities must be cleared at Board of Directors level and will not be counted as charitable donations unless the funds are paid directly to a registered charity's bank account.

Charitable donations of more than USD 500 must be pre-approved by the Board of Directors. All charitable payments or sponsorships below USD 500 must be signed off by a director.

WMS will not pay any political donations or make contributions to political party funds in any country of operation.

4.0 Events, Hospitality & Gifts Received by WMS Agents

4.1 Gifts Received by WMS staff

WMS agents may accept smaller gifts (such as stationery and small leather goods, food items and flowers) received from third parties, up to a value of USD 25 per head. Receipt of a succession of smaller gifts in any 3 month period should be brought to the attention of immediate supervisor. A gift will need to be declined politely if it is excessively generous, or if acceptance is judged by a Director to be inappropriate. No member of WMS Agents should feel indebted to any operator, supplier or other business contact.

All gifts must be acknowledged in writing, using WMS E-mail with copy to the immediate supervisor. Larger gifts, over USD 100, including offers of hospitality such as tickets to events or meals, must be acknowledged within 5 days of receipt of the invitation.

Where appropriate, a large gift may be accepted for distribution within a team. In rare circumstances where a large value gift is received and declining would be likely to cause major offence, the gift must be acknowledged by a senior

Corporate Policy Document – Events & Hospitality Code

member of management who should explain the Group's policy on acceptance of gifts. Gifts of substantial size and/or value must not be taken to an employee's home or used for the benefit of a single employee but should be used in a way which will benefit the Group as a whole. Gifts and offers of corporate hospitality received must not be passed on for use by a family member or third party not employed by WMS and must never be sold to a third party.

4.2 Corporate Hospitality offered to WMS Agents

Invitations which are known to be offered to a number of representatives of different companies may be accepted. An exclusive invitation issued to a WMS Agent from a contact, who has not previously done business with the Company should be treated with caution.

WMS Agent must not accept hospitality from any supplier involved in a government or corporate client competitive tendering process while that process is underway. This is to protect individuals against any accusations of unfair selection of contractors during a tender process.

WMS trusts its Agents to use their judgement when accepting business hospitality from third parties (i.e. an invitation to a meal or event and its location should be appropriate and the frequency of such hospitality should be capable of being justified). If an employee is in any way uncomfortable about the lavishness of the hospitality or is unsure about the motives of the person or organisation offering the invitation, he or she should raise the matter with their supervisors immediately. An Agent will not be reimbursed by the Company for additional expenses relating to an offer of hospitality (eg ground transport or overnight accommodation) unless this is absolutely required in order to accept the invitation and has been cleared in advance by a Director.

Where additional hospitality is offered unexpectedly (eg a post-meal visit to a club or entertainment venue), all the received hospitality, including an

Corporate Policy Document – Events & Hospitality Code

estimate of the value of additional meals or drinks, must be reported to the supervisor within 5 days of such event.

4.3 Due Diligence or Review Visits Involving Contractors or Suppliers

WMS prefers to pay its own subsistence costs for employees undertaking reviews of suppliers or contractors. Working lunches may be part of this process but employees should take care not to accept any cash payments or other inducements offered by a third party. Any attempt on the part of an operator or other supplier to undermine the impartiality of WMS Agents by the offer of substantial gifts or other inducements should be reported immediately to a Director.

5.0 Record Keeping

Financial and non-financial records which WMS maintains are disclosed to shareholders, regulators and other stakeholders. Accordingly, these records must be accurate and complete so that the Group can substantiate and justify any transactions with third parties.

All persons who are subject to this Policy must declare and record in writing all hospitality and gifts given or received. They must also submit expenses claims relating to hospitality, gifts or payments made to third parties promptly and provide justification for this expenditure.

All accounts, invoices, and other records involving transactions with third parties including suppliers and customers must be prepared accurately. Under no circumstances should a person prepare an account “off- book”, particularly where this is designed to conceal an improper transaction.

6.0 Disciplinary Procedures and Whistle-Blowing

Corporate Policy Document – Events & Hospitality Code

This policy is for the protection of staff and business contacts. It is important that WMS's dealings are fair and transparent and the Group does all it can to prevent allegations of corrupt practices.

Employees who do not comply with the corporate hospitality policy, for example by failing to register the receipt of gifts or who are found to have accepted hospitality without the approval of Director, or who have offered gifts or hospitality inappropriately, will be subject to disciplinary action, the consequences of which may be dismissal either with or without notice.

If a member of staff is concerned about the acceptance of inappropriate gifts or hospitality by others, the matter should be brought to the attention of a Director or the HR Department. In extreme cases where there is a severe potential for damage to the reputation of the Company or its financial position, any member of staff may raise their concern with The Anti Bribery Officer as part of WMS's whistle-blowing policy. No employee who discloses information in good faith about perceived deception or malpractice will suffer reprisals or victimisation, nor will their career be affected in any way.

7.0 Contact Details of ABMS:

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