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POLICY

GIFT, ENTERTAINMENT & HOSPITALITY POLICY

DEFINITIONS

Term	Description
Tiger Brands / Tiger	Tiger Brands Limited (for Group policies) or Tiger Consumer Brands Limited (for Business specific policies)
Legal Entity or Subsidiaries	Defined as separate legal entities where Tiger Brands has a controlling interest
Gift(s)	Any item of value given to or by an employee, including entertainment or hospitality, but specifically excluding cash or any other item referred to under "Usually Not Acceptable" Gifts.
Policy	Shall mean this Gift, Entertainment and Hospitality Policy
Closely Related Person	Any person related to an employee by blood or marriage, including, parents, siblings, children, spouse or the parents or siblings of your spouse (in-laws).
Employee	Any person(s) employed by Tiger Brands on a permanent, temporary or fixed-term basis (i.e. employees and contractors).



1 Introduction

The companies within the Tiger Brands Group are committed to ensuring adherence to the highest moral, legal and ethical standards and strive for integrity in all their dealings. Tiger Brands maintains relationships with many different stakeholders, including suppliers, contractors, consultants, government and other stakeholders. It is important that these relationships have a strong ethical basis and any decisions affecting stakeholders are made on sound commercial grounds. Whilst Tiger Brands recognises that gifts and entertainment can help maintain relationships and build goodwill, there is a danger that the improper giving or receiving of Gifts can lead to a conflict of interest and damage both the Tiger Brands' business and its reputation. It is important not only to do the right thing but also to be seen to be doing the right thing - third parties must never be in any doubt as to our motives, values and integrity.

2 Scope of the Policy

This Policy applies to all employees, temporary employees, contractors, service providers and consultants of Tiger, including all Tiger's subsidiaries within South Africa and outside of South Africa.

This policy does not cover gifts or entertainment extended among or between anyone employed within Tiger Brands or gifts extended by Tiger Brands to its employees, unless the motive for such Gift is intended to or appears to be designed to achieve any improper outcome or purpose.

3 Objective and Outcomes

The purpose of this Policy is to set out the principles, rules and guidelines for the giving and receiving of any form of gift, entertainment or hospitality, to or from any stakeholder of Tiger Brands. It is important for us to maintain our integrity and reputation as an ethical and moral company. We would lose this reputation if any of our actions are called into question as being unfair or discriminatory because we "favoured" a certain stakeholder because we received certain favours from such stakeholder.



4 Policy Statement

Gifts and Entertainment means anything of value given or provided to you or a close relative or provided by you to a third party in connection with your work for Tiger Brands. This will include, but is not limited to: customers' products, customer branded clothing or items, tickets to sporting or cultural events, meals, discounts, travel, accommodation or transportation, favourable terms on products or services, prizes, trips, customer incentive trips, hospitality events, shares, gift vouchers, invitations to conferences etc. It is prohibited for any employee to accept or give cash as part of a Gift or Entertainment in any dealing with a service provider, supplier or customer or business partner of Tiger Brands.

Due to the wide variety of potential items and differing circumstances, it is not possible to be prescriptive in terms of what is or is not acceptable. Accordingly, before accepting or offering any gift or entertainment, you must consider and apply the Guidelines and Principles set out below.

4.1 Principle 1: Exercise Good Judgment

- It is imperative that we all exercise good judgment and moderation at all times to ensure that our actions are never deemed to be improper at any time.
- If something does not feel right, it probably is not right.
- You must not give or accept Gifts for the purpose of improperly aiding a business decision or relationship or to gain an improper advantage.
- You must also not give or accept Gifts if by doing so could give the appearance of having an improper influence on a business relationship or decision.
- Excessive Gifts of any sort are generally unacceptable – whether in terms of frequency or value.
- Gifts received should not be automatically reciprocated: you must avoid feeling in anyone's "debt" for gifts or entertainment received.
- "Kickbacks", that is, anything of value provided directly or indirectly for the purpose of improperly obtaining or rewarding favourable treatment, must not be offered or accepted.
- Consideration must be given to the policies of the giver's or recipient's own organisation

4.2 Principle 2: Usually Acceptable Gifts



Gifts with an individual value of R1 000 (One Thousand Rands) or less from any one source on a single occasion (or R5 000 cumulatively over the course of one financial year) do not require approval (unless they fall into the category of 'Usually Not Acceptable', below), but must always be declared in the prescribed format. This type of Gift would include:

- Occasional meals with a business associate;
- Reasonable sports, theatre and other cultural events;
- Conferences, workshops and seminars or other networking events (provided that they do not exceed R1 000 per event, inclusive of any gifts or other memorabilia received);
- Other reasonable and customary gifts and entertainment; and
- Promotional items, such as point of sale materials or merchandising.

4.3 Principle 3: Usually Not Acceptable

The following types of Gifts and entertainment are always unacceptable. You may never accept or offer a gift or entertainment if it is:

- Illegal (in terms of the law);
- Cash or cash equivalent (such as shares, share options, gift certificates, vouchers or loans);
- A "quid pro quo" (that is, offered for something in return);
- Unsavoury or sexually orientated;
- Any gift which violates Tiger Brand's commitment to acting fairly and with integrity, respect and decency;
- Known to be in breach of the rules of the giver's or recipient's own organization;
- A gift or donation in breach of the Tiger Brands Corporate Social Investment Policy.

You should try to anticipate and avoid situations that might lead to an offer or receipt of an unacceptable gift or entertainment.

If you are offered anything that falls into the "Usually Not Acceptable" category, you must report it to the Group Company Secretary and return the gift immediately (unless it is impractical to do so, in which case the gift will remain Tiger Brands property and will be sold or donated to charity at the discretion of senior management). Any gift of cash or cash equivalent must be returned immediately. If appropriate, a letter should be sent to the person offering the gift, explaining that you cannot accept it because of Tiger Brand's gifts and entertainment policy.



In the event of you receiving a gift, which is not allowed in terms of this policy, and you are unable to return the gift, the gift should be handed in to the Group Company Secretary who will receipt same and hand over to the Corporate Affairs team to be donated or used in any other appropriate manner.

4.4 Principle 4: Offering Gifts or Entertainment

- Prior to offering a gift or entertainment with a value in excess of R1 000 to an individual working for a non-Tiger Brands organisation, you must obtain written approval from your line manager.
- Gifts and entertainment extended to Government officials create special risks and should be avoided (if possible) or treated with extreme caution and shall be subject to the necessary written approvals being obtained, as set out below.

4.5 Principle 5: Approval and Registration Requirements

- Each business unit will maintain a register in which Gifts will be required to be recorded. If necessary, you may therefore have to record the gift or entertainment in your business unit's Gift Register, whether such gift is accepted or rejected; and might also have to gain authorisation for the gift or entertainment from your relevant Executive Committee member. *(The requirement for a separate business unit gift register may be dispensed with in the event of an electronic declaration system being in operation)*
- All Gifts with a value of R1 000 or less, or with a cumulative value of R5 000 or less in one year from a single source, must be recorded on the gifts register template (Annexure A) and submitted to your line manager and the Group Company Secretary or recorded on the electronic declaration system (if applicable).
- Every employee receiving or giving gifts (irrespective of the employee's pay grade) is required to declare such gift by completing Annexure A and submitting same to the Group Company Secretary or by utilising any electronic Gift declaration system that may be available at the time. Where gifts exceed the allowable value, the declaration must be signed by all relevant parties, as set out in this Policy.
- No Conferences, workshops and seminars or other networking events exceeding the value of R1 000 (or with a cumulative value exceeding R5 000 in one year) from a single source may be accepted without written approval of your relevant Executive Committee member, or in the event of an Executive Committee



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member being the recipient, without the written approval of the Chief Executive Officer or Chairman of the Board of Directors (as the case may be).

- If you wish to give gifts or entertainment with an aggregate value of R 5 000 in any financial year to a single recipient, you must obtain prior approval of your business executive before committing to provide it.
- If you wish to give any gift or entertainment to a government official, you must obtain written approval of the Chief Legal Officer and the Group Company Secretary or the Chief Corporate Affairs Officer. It is the responsibility of the most senior person present or involved to ensure that the necessary approval and registration requirements are met.
- Any gift, entertainment or hospitality to be given to or received by any person as an incentive for achieving any pre-determined result shall be approved by the Chief Legal Officer in writing prior to such person commencing participation in any such incentive scheme, where the gift, entertainment or hospitality amounts to a holiday, travel or “trip” or anything of substantive value, eg. Win a Car promotions. This shall include any promotions undertaken by the Customer teams within some of its channels, eg. Spar – Win a Car Promotion.

4.6 Principle 6: Annual Declaration

All employees (Grade D Lower and above) will be required to certify annually whether they have complied with this policy. The limitation of the specific Grade may be reviewed and amended from time to time and shall be communicated via the Tiger Brands usual communication media.

4.7 Principle 7: Obligation to Report

All full time or part time employees, workers, suppliers, customers and contractors who have a reasonable belief that there is any incident or impending incident which relates to any matters specified in this policy, are encouraged to raise a concern or make a disclosure in terms of this policy. Concerns and disclosures must be raised without malice and in good faith, in line with the Whistleblowing Line Policy.

5 Accountabilities and Responsibilities



Although ultimate accountability for this Policy resides with the Tiger Brands Board of Directors ('the Board'), the Board has delegated authority to the Executive Management of Tiger Brands to act on its behalf in matters relating to this Policy.

5.1 Tiger Brands Executive Committee

Management are responsible to ensure their staff and third parties are aware and comply with this policy and other related policies.

5.2 Group Legal & Compliance

- The Chief Legal Officer is responsible for the creation and management of this Policy with the assistance of the Group Company Secretary.
- The Chief Legal Officer and the Group Compliance Director will be responsible for providing guidance and interpretation of this Policy, when required.
- The Group Company Secretary is responsible for the roll-out and day-to-day management and execution of this Policy and to maintain the Group Gift Register and to report to all management structures thereon.

5.3 Functional Areas within Tiger Brands

Responsibilities

- Each business / functional unit manager is required to maintain a business / functional unit Gift Register and shall provide updates to the Group Company Secretary quarterly, in the prescribed manner. (*The requirement for a separate business unit gift register may be dispensed with in the event of an electronic declaration system being in operation*)
- Each business / functional unit manager monitors and tracks the status of compliance within their business areas and provide regular updates at the relevant governance forums and / or to the Group Compliance Director, as and when required.

5.4 Forensics and Internal Audit

Responsibilities

- Will be responsible for the investigation of any report or complaint regarding any breach to this Policy and shall make recommendation to the relevant business / functional unit manager and / or Human Resources function.

5.5 Human Resources



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Responsibilities

- Assists Management in enforcing the disciplinary process for non-compliance with this Policy.

5.6 Employees and Third Parties

Responsibilities

- Every employee has the responsibility to know, adhere, and fully comply with this Policy.
- All employees and third parties are required to comply with the principles contained in this Policy, especially in respect of what is Acceptable and what is not.
- Every employee has a duty to inform third parties of the provisions of this policy when such employee becomes aware of the likelihood of a third party's intention to present any employee with a gift, entertainment or hospitality. Every employee receiving or giving Gifts must declare such Gifts in the prescribed manner.

6 Related Policies and Documents

- 6.1** Tiger Brands Code of Ethics
- 6.2** Anti-Bribery and Anti-Corruption Policy
- 6.3** Whistleblowing Line Policy
- 6.4** Disciplinary Code

7 Compliance, Monitoring and Reporting

- 7.1** Employees are required to familiarise and fully comply with this Policy.
- 7.2** Any employee who fails to comply with the provisions as set out above or any amendment thereto, may be subject to appropriate disciplinary or legal action.
- 7.3** Tiger Brands' policies, standards, procedures and guidelines comply with legal, regulatory and statutory requirements.
- 7.4** This Policy may be amended from time to time in the sole discretion of Tiger Brands.
- 7.5** Legal action may be instituted where deemed necessary.



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8 Annexures

8.1 Annexure A – Tiger Brands Gift Declaration



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9 Document Control Information

Document Details

Document Title	Gift Entertainment & Hospitality Policy
Document Description	The purpose of this Policy is to set out the principles, rules and guidelines for the giving and receiving of any form of gifts, entertainment or hospitality, to or from any stakeholder of Tiger Brands.
Document Owner	Group Company Secretary
Review Frequency	3 Years
Next Review Date	November 2024

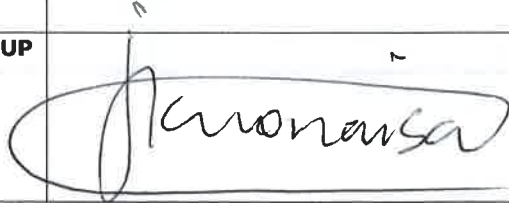
Document Approval

Policy Owner	Chief Legal Officer
Approval Committee	Executive Committee
Approval Date	05 November 2021

Document Revision History

Version	Date	Updated By	Approved By	Change Detail
2	24 November 2021	Avish Kalicharan	Executive Committee	Various updates

I confirm that the attached policy has been approved by the Tiger Brands Executive Committee and / or the Tiger Brands Board of Directors, as the case may be, and is effective as at the date of approval.

NAME OF POLICY	Gift Entertainment & Hospitality Policy
DATE OF APPROVAL	05 November 2021
SIGNATURE OF GROUP COMPANY SECRETARY	

DECLARATION: Tiger Brands Gifts, Entertainment and Hospitality Policy

Annexure A

EMPLOYEE: _____

BUSINESS UNIT: _____

MANAGING EXECUTIVE: _____

BUSINESS EXECUTIVE: _____

GIFTS ISSUED REGISTER

No.	Gift Issued by: (Employee Name, Surname and Employee No.)	Organisation Receiving Gift (Name, Surname and Organisation Name)	Gift Description & Reason for Gift being Issued	Date	Rand Amount	Managing Executive Approval	Business Approval	Executive Approval	Company Secretary Approval

GIFTS RECEIVED REGISTER

No.	Gift Received by: (Employee Name, Surname and Employee No.)	Organisation Issuing Gift	Gift Description & Reason for Gift	Date	Rand Amount	Line Manager Approval	Business Approval	Executive Approval	Company Secretary Approval

I hereby confirm that I have no disclosure to make as contemplated in the Gifts, Entertainment and Hospitality Policy in respect of the past year.
[TICK IF APPLICABLE]

Date _____

Signature _____