

DONATIONS AND SPONSORSHIPS POLICY

1. About this Policy

Xenith IG is committed to conducting business ethically, fairly, professionally, with integrity, and in compliance with all applicable laws and regulations. This Donations and Sponsorships Policy (“**Policy**”) describes the process for requesting approval prior to making any donations or sponsorships.

This Policy applies to all full-time, permanent, part-time and contract employees (“**you**”) of Xenith IG and is to be read together with other policies referred to in this Policy.

2. Objectives of this Policy

- (a) To provide clear guidance for giving donations and sponsorships.
- (b) To state our requirements and procedures for giving donations and sponsorships.

3. General principles

Donations and sponsorships may be perceived as a form of bribery or corruption. At Xenith IG, we take a zero-tolerance approach to all forms of bribery and corruption. The making or receiving of any form of donations or sponsorships must be carried out with proper care as to avoid the risk of allegations of impropriety or the creation of a perception of bribery or corruption, particularly in the event such donations or sponsorships could influence or be perceived to influence the outcome of a business decision or a regulatory approval.

4. Prohibited activities

Giving or receiving donations and sponsorships that could influence, be perceived to influence, or actually influence the outcome of a business decision or regulatory approval, or that could present an actual or perceived risk of bribery or corruption are prohibited. Anonymous donations are prohibited. All donations and sponsorships must be made to identifiable and verifiable recipients.

The following categories of donations and sponsorships, which is not an exhaustive list, are generally prohibited:

- (a) donations and sponsorships made in cash, currency or cash equivalents (e.g. gift cards or vouchers);
- (b) donations and sponsorships made to obtain or retain business, or in any other form that could constitute or give the impression of bribery;
- (c) donations and sponsorships made to any government official, politically exposed person, politically affiliated entity or government agency made to secure a regulatory approval, or in any other form that could constitute or give the impression of corruption;
- (d) donations and sponsorships to organisations or individuals that have or are suspected to be engaged in bribery, corruption, or other unethical conduct;
- (e) donations and sponsorships made for the personal benefit of a particular individual; and
- (f) donations and sponsorships prohibited by applicable laws and regulations.

5. Permissible activities

The following categories of donations and sponsorships are generally permissible, but must still be evaluated in accordance with this Policy and approved by our Chief Executive Officer or Chief Commercial Officer prior to any commitment or expenditure:

- (a) sponsorships towards digital infrastructure and telecommunications industry related conferences, events and activities that are generally open to all participants to sponsor;
- (b) donations to registered charities under the laws of the relevant jurisdiction for charitable purposes, to benefit a social cause, to serve the public interest, or for the common good; and
- (c) donations and sponsorships towards other events, activities, or professional organizations in return for the opportunity to advertise the Xenith IG brand.

6. Donations and Sponsorships Register

Donations and sponsorships exceeding the following thresholds (or the equivalent value in any other currency) must be submitted to the Legal and Compliance Department for review and recorded in our Donations and Sponsorships Register:

- (a) donations and sponsorships given to any government agency or government official, or events and activities organised by or affiliated with any government agency or government official, regardless of value;
- (b) sponsorships towards digital infrastructure and telecommunications industry related conferences, events and activities, exceeding USD 20,000;
- (c) donations to registered charities under the laws of the relevant jurisdiction for charitable purposes, exceeding USD 15,000;
- (d) donations and sponsorships other events, activities, or professional organizations in return for the opportunity to advertise the Xenith IG brand, exceeding USD 10,000; and
- (e) any other donation or sponsorship exceeding USD 5,000.

Submission to the Legal and Compliance Department for review must be submitted using the [Donations and Sponsorships Request Form](#).

7. Supporting documents

All records associated with the donations and sponsorships, such as receipts, agreements, approvals or rejections among others will be maintained by Xenith IG.

You must submit as part of your request for approval a proposed sponsorship or donation agreement, which describes the following:

- (a) details of the recipient, the amount of funds and how the funds are to be paid;
- (b) detailed terms and conditions, including any right of return of funds and termination rights; and
- (c) specific description of the planned use for the funds.

The final signed agreement and official invoice or receipt for the donations or sponsorships must be submitted to our Finance and Legal and Compliance Department for record purposes.

8. Personal contributions

You are permitted to make donations, sponsorships and other contributions as private individuals using your own resources, provided the donation or sponsorship will not reasonably be perceived to be a donation or sponsorship from Xenith IG (in which case, this Policy applies).

Whenever you participate in political activities, you must make it clear that your actions and opinions reflect your individual beliefs, and not those of Xenith IG. Xenith IG is politically neutral and is not affiliated with any political party or group.

9. Non-compliance

9.1. Failure to comply

Failure to comply with this Policy and the above procedures may result in disciplinary action and legal action being taken wherever appropriate. Such actions may include suspension or termination of your employment.

9.2. Reporting non-compliance

If you are aware of or suspect there is an actual or potential breach of this Policy, you should make a report in accordance with our Whistleblowing Policy by sending an email to the Whistleblowing Email at whistleblowing@xenithig.com.

10. Additional guidance

If you have any questions in relation to this Policy, please contact the Legal and Compliance Department at legal@xenithig.com.