

GIFTS AND HOSPITALITY POLICY

1. About this Policy

This Gifts and Hospitality Policy (“**Policy**”) explains the requirements and procedures required of you regarding providing or receiving gifts, hospitality or other benefits from any of our customers, suppliers, contractors or any other third parties.

Gifts, hospitality and other benefits could be perceived as means for influencing our business decision-making process or obtaining undue business advantages, giving rise to conflicts of interest and potentially constituting an attempt at bribery or corruption.

Gifts include any item of value provided to or received from a third party. Hospitality includes any business entertainment, including invitations to lunches, dinners and sporting or other events.

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

2. Objectives of this Policy

- (a) To provide clear guidance for giving and accepting gifts and hospitality.
- (b) To state our requirements and procedures for giving and accepting gifts and hospitality.
- (c) To ensure our officers, employees, staff and agents do not exploit their positions for personal benefit.

3. Permitted gifts and hospitality

3.1. Principles concerning gifts and hospitality

We accept that the occasional and modest giving and acceptance of gifts and hospitality may be for legitimate purposes in the general course of business, including building of good business relationships and marketing our products and services.

However, we prohibit the giving or receiving of gifts and hospitality that could:

- (a) influence or be perceived as capable of influencing the outcome of transactions or decisions relating to our business;
- (b) amount to, or cause us or the receiver/giver to commit a criminal offence, including breach of any Anti-Bribery and Corruption Laws (as defined in the Anti-Bribery and Corruption Policy); and
- (c) cause offence to others or damage to the reputation of Xenith IG.

We absolutely prohibit the giving or receiving of gifts and hospitality:

- (a) that are excessive or inappropriate or which are conditional on particular behaviours or conduct;
- (b) to or from anyone directly or indirectly involved in a pending bid, application, contract or decision that could impact our business; and
- (c) in the form of cash or cash equivalents (such as gift certificates or vouchers).

The principles above apply even if you use your personal money to provide the gift or hospitality and do not seek reimbursement from Xenith IG.

3.2. Permitted gifts and hospitality

Subject to the principles in clause 3.1, the giving and receiving of gifts and hospitality in the circumstances below are permitted:

(a) Seasonal gifts

The giving and receiving of seasonal or festive gifts to and from Business Partners, such as hampers for Chinese New Year, Hari Raya Aidilfitri or Christmas, as tokens of appreciation, provided the gift is a tangible item of nominal or moderate value and is not cash or a cash equivalent.

(b) Corporate premiums at industry or corporate events

The giving of promotional or Xenith IG branded gifts, such as samples, calendars, notebooks, pens, water bottles, caps, T-shirts, jackets, and similar items, distributed at industry events, company events, or conferences.

(c) Business hospitality at industry events

The provision or receipt of hospitality – including entry tickets, attendance passes, or invitations to industry conferences, seminars, trade exhibitions, and professional networking events – that is directly relevant to Xenith IG's business activities in the telecommunications and digital infrastructure sector.

(d) Business marketing events

The hosting or attendance of business marketing events provided (i) the primary purpose of the occasion is business-related and not purely social; and (ii) any meal or refreshment provided is of a reasonable standard and cost proportionate to the seniority of the attendees and the business context.

(e) Gifts and hospitality at ceremonial or hosted events

The giving or receiving of gifts and hospitality where this is customary as a matter of professional protocol – such as at the signing of a memorandum of understanding, a formal launch event, a site visit or a facility tour is permitted, provided (i) the gift is a tangible item of nominal or moderate value and is not cash or a cash equivalent; and (ii) any meal or refreshment provided is of a reasonable standard and cost proportionate to the seniority of the attendees and the business context.

(f) Hospitality in the ordinary course of business

Business lunches, dinners and other hospitality in the general course of business, provided that such lunches, dinners and other hospitality are modest and reasonable as judged by local standards and below SGD 250 (or the equivalent value in any other currency) per person.

Other than hospitality in the ordinary course of business, the giving of gifts and hosting of events and hospitality by Xenith IG must be pre-approved by our Chief Executive Officer or Chief Commercial Officer. The giving of gifts or hospitality to any government agency or

government officials, regardless of value, must also involve the Legal and Compliance Department without exception. Where the local laws of your jurisdiction prohibit the giving or receiving of gifts or hospitality to any person, you must comply with the applicable laws of your jurisdiction.

4. Gifts and Hospitality Register

All other gifts and hospitality (other than as permitted under clause 3) must be submitted to the Legal and Compliance Department for review and recorded in our Gifts and Hospitality Register, including:

- (a) the giving of gifts or hospitality to any government agency or government officials, regardless of value;
- (b) the giving of gifts of any kind to any person (other than as permitted under clause 3.2), regardless of value;
- (c) the giving of hospitality to any Business Partner in the ordinary course of business, valued at more than SGD 250 per person; and
- (d) the receipt of gifts or hospitality from any Business Partner valued at more than SGD 250 per person.

All gifts you receive in your capacity as an employee of Xenith IG are considered gifts to Xenith IG and not to you personally. To the extent possible, such as in the case of food items and hampers, gifts must be shared amongst all people in your office.

When offered gifts or hospitality which may be beyond the principles in clause 3.1, you must (i) decline the gift or hospitality politely; and (ii) declare the same to the Legal and Compliance Department as soon as possible.

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

Under no circumstances should you contribute towards or ask others to contribute towards the costs of the gifts or hospitality, including using your own money, in order to bring the total spend below the monetary thresholds above.

5. Non-compliance

5.1. 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.

5.2. 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.

6. Additional guidance

Regardless of the parameters set out in this Policy, you are expected to exercise proper business judgement and conduct yourself in a manner that is consistent with our policies and values. If you have any questions in relation to this Policy, please contact the Legal and Compliance Department at legal@xenithig.com.