

## Company policy on Gifts and donations

### Purpose

Integrity is our value and the foundation of MSP CAT corporate strategy built upon our Code of Conduct. We encourage all employees to follow and live by the code.

### Policy

The Company and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain uncompetitive favors to conduct its business. However, the Company and its employees may accept and offer nominal gifts, which are customarily given and are of a commemorative nature.

### Applicability

All Company employees

### Procedure

In case of doubt, all employees should seek guidance and clarification from the CFO or compliance department.

Every employee shall promptly report to his/her superior or to the CEO or to the Board of Directors any actual or possible violation of this Code, in an event he or she becomes aware of any breach of this policy or any event that could affect the reputation of the Company.

### Training to employees

To provide on-going Gifts and donations policy compliance training to new employees at the time of orientation and annual refresher training to all employees.

Company may select an individual employee or a group of employees to attend that training based on job function and assessed risks.

### Governance

Consistent review by management.

Annual compliance risk assessments to be conducted by Compliance Department.

Date : 25 March 2016

Approved by : (1) Chief Executive Officer



(2) Chief Human Resource Officer

