



Gifts and Hospitality Policy

1. Definition

Gifts include any item of value provided to a third party or their employees or received from a third party by Antonick Interiors Inc or its employees. (See table below in 4.2.2. for definitions of value)

Hospitality includes any business entertaining, such as travel, accommodation, meals and invitations to events given to Carillion and its employees by third parties or given by Antonick Interiors Inc to third parties.

2. Objective

- To ensure that Antonick Interiors Inc commits to all of our values by providing clear guidance.
- To communicate Antonick Interiors Inc's requirements in respect of the acceptance and receipt of gifts and hospitality.
- To ensure that employees do not exploit their position for personal benefit.

3. Scope

This policy applies to all employees of Antonick Interiors Inc, all its subsidiaries and associated companies.

4. Procedure

4.1. General Principle

As a general principle accepting or giving gifts or hospitality is discouraged. Whilst the occasional modest giving and acceptance of gifts and hospitality may be a legitimate contribution to good business relationships, it is essential that they do not influence, nor could be perceived as influencing, business decision making. All Antonick employees must consider whether the giving or receiving of a gift or hospitality is appropriate. It is prohibited to offer or receive gifts or hospitality that could influence or be perceived to be capable of influencing the outcome of transactions or decisions relating to Antonick Interiors Inc's business.

4.2. Receiving Gifts or Hospitality

4.2.1. The Principle

In principle, Antonick Interiors Inc does not permit employees to receive gifts from third parties. Money may never be accepted. Gifts should be returned to the third party with an explanation to the effect that it is not to Antonick Interiors Inc's policy to accept gifts unless it is considered that declining a gift may cause offence. In this situation, use the table below to ensure the correct procedures are followed.

4.2.2. Receiving Gifts and Hospitality Guide

Benefit Received	Procedure
<p>Small Gift – Below \$50.</p> <p>(Includes diaries, Calanders, pens, etc.)</p>	<p>Individuals may accept. No record or approval required.</p>
<p>Gifts in Excess of \$50</p> <p>(i.e. bottles of champagne, spirits, gift certificates, vouchers, presents)</p>	<p>All gifts over \$50 must be surrendered into departmental or business raffles/auctions to allow all to participate in the opportunity to benefit (and raise funds for Company approved charities where appropriate). Gifts in excess of \$150 must be approved and recorded in a Gifts and Hospitality Report (refer to Appendix 1). For all gifts accepted the following steps apply:</p> <ul style="list-style-type: none"> • Value between \$50 and \$150 - Inform Line Manager and surrender. • Value between \$150 and \$800 - Obtain written approval from Line Manager, surrender and record in the Gifts and Hospitality Report. • Value in excess of \$800 - Obtain written approval from the relevant Senior Management Team (SMT) member, surrender and record in the Gifts and Hospitality Report. (SMT member requires approval from Corporate Executive Team (CET) member and the CET member requires authorisation from an Executive Director.)
<p>Attendance at business functions associated with your role in Antonick Interiors Inc or your Professional status</p> <p>(i.e. professional dinners/events).</p>	<p>Inform and obtain verbal consent from your Line Manager prior to the event.</p>
<p>Hospitality/Entertainment Accepted</p> <p>(i.e. lunches, dinners)</p>	<p>Ensure that it is reasonable, proportionate, not lavish and that Antonick Interiors Inc would be willing to reciprocate. Where hospitality exceeds \$150 approval and recording in the Gifts and Hospitality is required:</p> <ul style="list-style-type: none"> • Value between \$150 and \$800 – Obtain written approval from Line Manager and record in the Gifts and Hospitality Report. • Value in excess of \$800 – Obtain written approval from relevant

	Senior Management Team member and record in the Gifts and Hospitality Report (SMT member requires approval from Corporate Executive Team member and the CET member requires authorisation from an Executive Director).
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

(Approvals must be written but could be in the form of an email. The approval must be attached to the Gifts and Hospitality Report and kept for audit purposes).

When determining the monetary value of a benefit, market value must be taken into account. Where no monetary value can be placed on a benefit Antonick Interiors Inc must consider if the acceptance could give rise to a conflict of interest or be perceived to be inappropriate and seek guidance from his/her Line Manager.

4.3. Giving Gifts or Hospitality

4.3.1. The Principle.

The giving of gifts to third parties is discouraged. In determining whether the giving of a gift is appropriate, consideration should be given to the recipient, the value of the gift and the reason for it.

Hospitality given should be within the boundaries of Antonick Interiors Inc Expenses Policy. Hospitality may be offered if it is reasonable in all the circumstances to do so and is proportionate and not lavish or extravagant.

4.3.2. Giving Gifts and Hospitality Guide

It is essential that the following steps are taken when giving gifts or hospitality:

- Gifts or hospitality given must be pre-authorized by a relevant SMT member. At SMT level approval will be by the CET member. For the CET member, authorisation will be by an Executive Director. For gifts a documented record of approval must be maintained (it may be a written approval or email).
- Benefits provided with a value in excess of \$150 in total must be recorded in the Gifts and Hospitality Report, with details of the individual or customer to whom it was provided.
- Gifts and hospitality given must be consistent with the policy of the applicable third-party organization.
- Under no circumstances shall Antonick Interiors Inc partners (including suppliers, business partners, joint venture partners, sub contractors or advisors) be asked to contribute towards the cost of entertaining customers on behalf of Antonick Interiors Inc.
- There is a risk that gifts or hospitality provided to foreign public officials may be construed as a bribe, in these circumstances pre-approval must be given by the relevant SMT member.

4.4. Reporting Gifts and Hospitality

On the 1st working day of every month manager of every business unit sends "Gifts and Hospitality Report" and all appropriate approvals to Senior Vice President Human Resources via e-mail. Copy of the Report and approvals are to be kept with the manager of the business unit for audit purposes.

Nil reports are required.

Appendix 1. Gifts and Hospitality Report

Approval List:

Antonio Repaci

Approved by

22/04/2024

Date