	Business Integrity Management	Version: 1.0
	Donations, Gifts and Hospitality Policy	Date: 01 Dec 2020
		BI1-META-010-DOC3

1 PURPOSE AND SCOPE

This policy addresses the procedures for employees relating to the provision and receipt of bestows, benefits and hospitality, and expectations of gift exchanges between employees and clients. Gifts and Benefits are defined in this policy as:

Gifts and Benefits - The transfer of property or other benefit without recompense or for a consideration substantially less than full consideration; or a loan of property made on a permanent, or an indefinite, basis; received or given by an official when they are acting in their official capacity.

For the purposes of this directive, gifts and/or benefits include tangible items of lasting value and intangible items of no lasting value (including hospitality). It does not include any gifts or benefits given or received under an appropriately approved employee health and well-being program or an appropriately approved rewards and recognition program.

This policy is applicable to META Group (META) and its operational companies (OpCos).

2 PROCEDURE

2.1 Approach


All employees are required to comply with all applicable laws and regulations when doing business on behalf of META and when the following occurs:

2.1.1 Giving and Receiving Gifts

Employees are prohibited from accepting lavish gifts, incentives or gratuities or any gift where it could appear that their judgment regarding META interests would be compromised. Employees may accept gifts that are of a nominal value. If and where it is not feasible to return a gift to the original sender, the item itself should be either donated for charity or shared among all employees of subject to a draw.

The giving and accepting of gifts is allowed if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It is given in the company name, not in an individual name;
- It does not include cash or a cash equivalent;
- It is appropriate in the circumstances, taking account of the reason for the gift, its timing and value;
- It is given openly, not secretly; and
- It complies with any applicable local law. Where a gift is offered but refused, employees must report this to management.

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Promotional gifts of low value such as branded stationary to or from existing customers, suppliers and business partners will usually be acceptable, however all gifts must be reasonable, proportionate, and authorized by management.

All gifts, above \$50 in value, must be reported to management and recorded in the Gifts and Donations Register. Where a gift considered lavish is offered but refused, this must also be reported to management.

2.1.2 Hospitality

Employees may accept hospitality that is reasonable in the context of the business, for example accompanying a business associate to a local cultural or sporting event, business meal or conference would in most cases be acceptable.

Hospitality that is lavish or frequent may appear to influence the independent judgment of the employee on behalf of META. Where an invitation appears inappropriate, the offer must be declined or the true value of the hospitality paid. All invitations for hospitality should be discussed with and authorized by management.

Employees may provide hospitality that is appropriate and reasonable in the context of the business. Employees must not provide hospitality without seeking approval and authority from management.

Applicable laws may prohibit the provision of hospitality, e.g. to government officials, therefore all local laws and regulations should be checked in advance.

2.1.3 Acceptance of Travel and Accommodation


Employees may accept transportation and accommodation provided by a supplier or other third party, if the trip is for business, is approved in advance by management and it also complies with the 'Hospitality' requirements set out above. All travel of this nature should be accurately recorded.

Unless prohibited by applicable law or the policy of the recipients' organization, META may pay the transportation and accommodation expenses incurred by customers, agents, supplier and other third parties in connection with the business of META. The visit must be for a business purpose, for example on-site examination of operations, training or investor or public relations.

All travel which is sponsored or paid for by META should be authorized by management.

2.1.4 Donations to Organizations

No employee should make donations or contributions to any charity, political party, or organization on behalf of META without the express approval of senior management. No donations should be made with the intention of gaining a business advantage.

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2.1.5 Expenses

All employee expense claims must be authorized by management. Managers are expected to check and sign all expense claims and against the appropriate receipts. Any items of expenditure that give rise to concern should be fully investigated.

2.2 Management Responsibility

Management is responsible for ensuring that all of the employees of META are aware of this Policy and fully understand the rules in relation to this Policy. If management is concerned about any actions, they should contact the META Group Compliance Officer immediately for advice.


2.3 Further Clarification

META recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality;
- The giving of a ceremonial gift on a festival or at another special time.

3 COMMUNICATION

The Donations, Gifts and Hospitality Policy should be available and accessible to all META employees, including the employees of its Operational Companies, as well as contractors.

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4 APPROVAL AND VERSION CONTROL

Approval:

	Date	Name	Position	Signature
Created:				
Reviewed:				
Approved:				

Revision History:

Revision no.	Revision Date	Name	Description