

Gift

POLICY

1. Purpose

CONVERGE ICT SOLUTIONS, INC. (the “Company”) is dedicated to achieving the highest standards of ethical behavior. This policy will serve as a guideline on the appropriateness of giving and/or receiving gifts and actions needed before providing or obtaining gifts.

2. Scope

This policy applies to the giving and receiving of gifts made by executives, officers, employees, and business partners who are acting on behalf of the Company. This also includes family members, relatives and any other person or entity acting at the direction of any employee or business partners of the Company.

3. Policy Statements

3.1. Preliminary Information

A “gift” is anything of value that is given or received by any individual who is working for the Company to/from any person or entity with which the Company does business with or is actively considering doing business such as but not limited to consultants, suppliers, vendors, service providers, distributors, and customers.

Examples of gift may include but is not limited to the following:

- Cash and cash equivalents
- Stocks / Gift vouchers or certificates / gift baskets
- Entertainment such as theater and sports tickets
- Discounts and rebates on products and services not readily available to the public
- Intangibles such as valuable personal favors, gratuity, loans, assumption, or forgiveness of debts, or offers and/or preferential treatment in connection with employment and internships
- Services, equipment, products, transportation
- Payment or reimbursement of travel expenses
- Any other form of compensation or benefit

3.2. Inappropriate Gifts

Employees must not offer, accept or request of the following gifts in connection with work at the Company:

- 3.2.1. Any amount of cash or cash equivalents which may include but not limited to stocks, gift vouchers or certificates, gift cards or discount cards even if they are only redeemable for merchandise.
- 3.2.2. Favors or entertainment that violates any law, regulation or CICT policy.

- 3.2.3. Anything that is part of an agreement to do something in return for gifts, entertainment or favors.
- 3.2.4. Gifts, favors, gratuity, entertainment, loan or anything of monetary value to be given directly or indirectly, to any Government Official, political party or candidate, or anyone acting on behalf of a public international organization, in order to obtain or retain business, direct business to any person, or to gain an improper business advantage.

3.3. Appropriate Gifts

- 3.3.1. The following gifts can be given/received during events such as seminars, conferences, training events and tradeshow wherein they are offered equally to every individual who attended the event: t-shirts, mugs, pens, calendars, or other promotional items offered.
- 3.3.2. Gifts with corporate logo that will promote the Company but do not have retail value.
- 3.3.3. Food, beverages, and/or tickets to local events that are supplied by the Company and will also be attended by partners, customers, suppliers, or vendors in the benefit of building positive business relationships.
- 3.3.4. Moderately priced gifts that are approved by the designated approvers before giving/receiving to develop positive working relationships and company interests.

3.4. Approval of Gifts

When giving or receiving gifts, it must be considered whether the timing, as well as the frequency of giving/receiving, may create an appearance of unnecessary influence. If the act of giving/receiving gifts will create an appearance of impropriety or undue influence, it will be best not to provide or receive any gift. Below is the threshold and designated approvers for gifts:

- 3.4.1 All gifts from any team member to any member of the management team outside of the customary occasion (Birthday, Christmas, Chinese New Year, etc.) regardless of the value is not allowed and any exception should secure proper approval of the HR and Compliance Team.
- 3.4.2 Three Thousand Pesos (P3,000.00) and below – secure approval from immediate supervisor and HR.
- 3.4.3 Beyond Three Thousand Pesos (P3,000.00) – secure approval from immediate supervisor HR, and submit Entertainment, Gifts & Travel Checklist (refer to Annex 1) with supporting documentation to Compliance Team for approval. An approved copy of the checklist must be provided to the Legal Department as well.

All employees must secure approvals from designated approvers mentioned above prior to accepting or giving gifts to prevent any appearance of impropriety.

3.5. Informing of this Policy

Employees are required to inform suppliers or vendors and even potential ones of this policy. Employees shall request them to respect the Company's policy and all given gifts may only be received once approval is secured.

3.6. Guidelines when Giving Gifts

The guidelines below apply to gifts given to representatives of current or potential customers, suppliers or other business partners, as well as their families, relatives, and any other person or entity acting at the direction of any employee or business partners of the Company.

- 3.6.1 It must have a proper purpose that is not intended to secure improper advantage or inappropriately influence the recipient.
- 3.6.2. It should be permitted by the recipient's policies and by any agreement between the Company and the recipient's employer.
- 3.6.3. It must be reasonable in value and culturally appropriate under the circumstances.
- 3.6.4. To such extent possible, company-branded items are preferred.
- 3.6.5. It must be consistent with local customs.
- 3.6.6. Refrain from giving gifts frequently to the same group or individual.
- 3.6.7. Give gifts for official, rather than personal use.
- 3.6.8. Gift must be compliant to all applicable local and international laws.
- 3.6.9. It will not cause any embarrassment to the Company or damage its reputation.
- 3.6.10. Expense must be properly tracked in CICT's books and records and substantiated with proper receipts.

There are several companies that have policies relating to what their employees can accept. There are also times when contracts with clients or other parties specifically limit or forbid CICT employees from providing such gifts to their employees. In line with this, the Compliance Team shall always properly review the recipient's policies before offering and shall give written consent to proceed.

3.7. Record Keeping

Every employee is responsible in keeping track of the gifts being given or received. Compliance shall monitor Entertainment, Gifts & Travel Checklist (refer to Annex 1) with supporting documentation. Every approval must be kept properly under this policy. In case employee is unable to provide copies of proper approvals proving Compliance Team, he/she will be considered as non-compliant for this policy.

3.8. Reporting Process

3.8.1. In case employee discern non-compliance of this policy made by a fellow employee, he/she may report to anyone from the following:

- Compliance Team
- Ethics Committee
- Human Resource Group

3.8.2. Reporting may be done through any means including but not limited to SMS text, letter, email, or phone call. The person making the report may do so anonymously. However, the Company encourages the individual making the report to disclose his/her identity in case there is a need to clarify or verify the report or in case additional information is needed before or during the investigation or fact-finding.

3.9. Consequences for Non-compliance

Any employee who is proven to be non-compliant with this policy may be subject to disciplinary action, other corrective action or even termination of employment depending on the severity of non-compliance.

3.10 Protection from Retaliation

The Company shall protect the person who reports in good faith from any form of retaliation, retribution, harassment, or pressure. He/she must not be demoted, suspended, terminated, harassed, or even discriminated solely because he/she reported a possible violation in good faith.

ENTERTAINMENT, GIFTS & TRAVEL CHECKLIST

Personal Information

Name:		Title:	
Business Unit:		Location:	

Describe the Entertainment, Gift or Travel to be received or provided

Indicate the name and title of provider or recipient of the Entertainment, Gift or Travel. (Also include the company of each individual represents and whether any of the individuals are spouses/relatives/guests of either the provider or recipient)

Does CICT have ongoing business with the company/companies specified above?

YES NO

Who selected the recipient?

CICT
 The recipient's employer
 Other
If Other, please specify:

What is the purpose of the Entertainment, Gift or Travel?

Is the Entertainment, Gift or Travel related to a specific transaction/activity/contract?

YES NO
If Yes, please specify:

What is the estimated Entertainment, Gift or Travel cost per person (in Philippine Peso)?

ENTERTAINMENT, GIFTS & TRAVEL CHECKLIST

Submit by Email

Print Form

Who will bear the costs for the Entertainment, Gift or Travel?	
If CICT is bearing the costs, (a) Is CICT paying the vendors/suppliers directly?	<input type="checkbox"/> YES <input type="checkbox"/> NO
(b) Is CICT providing any payment to individual participants?	<input type="checkbox"/> YES <input type="checkbox"/> NO <i>If Yes, please specify the amount:</i>
(c) Is CICT reimbursing participants for costs incurred?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Will the Entertainment, Gift and/or Travel cause embarrassment to CICT if it is described by the media, even if it is legal and permissible under CICT's policies?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Has approval from designated approver been obtained? <i>(If Yes, please include the approval from designated approver)</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
~ To be filled out by Compliance Team ~	
Approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO <i>If No, please provide reason:</i> :
Approved By:	_____ Name and Date