



**BAKER TECHNOLOGY LIMITED &
SUBSIDIARIES**
(collectively “Group”)

CORPORATE OPERATING PROCEDURES

Gift & Hospitality Policy

Revision	Date	Remarks	Document and Revision number	Prepared	Approved
1	25 June 2024	Approved for Use	BTL-SOP-CORP-007	JC	Board

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All queries, suggestions, interpretation, clarification or change request shall be addressed at the first instance to the CEO or if unavailable his delegate.
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Table of Contents

1.0	PURPOSE	3
2.0	SCOPE	3
3.0	DEFINITIONS.....	3
4.0	GIFTS, ENTERTAINMENT AND PROVISION OF ANYTHING OF VALUE ("G&E)	4
5.0	REPORTING.....	4

1.0 PURPOSE

- 1.1 Baker Technology Limited, together with its subsidiaries, (collectively the “Group”) is committed to conducting our businesses and operations in an ethical, honest and professional manner.
- 1.2 We adopt a zero-tolerance policy towards any form of bribery and corruption and are committed to acting transparently, fairly and with integrity in all our business activities and relationships. We implement and enforce and will continuously improve on our processes and procedures to prevent corrupt behaviour in order to safeguard and uphold our values.
- 1.3 This Gift & Hospitality Policy (the “Policy”) sets out the Group’s policies and guiding principles on how to conduct our businesses with honesty, fairness and to a high ethical standard. The Policy sets out the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be applied.
- 1.4 This Policy should be read in conjunction with the Group’s Anti-Bribery and Corruption Policy.

2.0 SCOPE

- 2.1 This Policy is to be abided by the following personnel (individually, “Group Person” and collectively, “Group Personnel”) of the Group:
 - a) Directors and Officers
 - b) Employees (full and part-time);
 - c) Contract workers (including crew)
 - d) Consultants, representatives, agents and intermediaries engaged by the Group for the purpose of representing the Group in certain areas of works (collectively, the “Company Representatives”)
- 2.2 Each subsidiary or Company Representatives may, at their discretion, establish more stringent limits, but not less. Group Personnel who are directors on boards of joint ventures where the Group does not have a controlling interest should encourage the joint venture to adopt this Policy or use a similar policy.

3.0 DEFINITIONS

- 3.1 “Anything of Value” means financial advantage, services, favours or any other direct or indirect benefits or gratifications, whether in cash or in kind, tangible or intangible which include but are not limited to gifts, facilitation payments, meals, entertainment, discounts that are out of the ordinary or routine businesses, charitable donations, employment offers, loans, sexual favours, etc.
- 3.2 “Government Official” includes any elected or appointed official of a national or local government entity of any country; representatives or employees of a government agency at any level, including customs, immigration and transportation workers, military personnel, representatives of political parties, candidates for political office, representatives of public international organization (IMO), employees of state-owned or controlled entities in any part of the world (eg. state-owned oil

companies) and any entity hired or appointed by government authorities for any purpose (eg classification society).

4.0 GIFTS, ENTERTAINMENT AND PROVISION OF ANYTHING OF VALUE (“G&E”)

4.1 In addition to the guidelines and restrictions as set out in the Anti-Bribery and Corruption Policy, such G&E should satisfy the following guidelines:

	Give	Receive	Emp grade	\$ threshold	Declare	Pre-approval	Comments
Gift	✓		All		x	x	eg Corporate gift with logo, festive gift given to several clients
Gift	✓		< MD	≤ \$100 per gift	x	x	Excludes perishables
				\$100 < ≤ \$200	✓	✓ MD	
				> \$200	✓	✓ CEO	
Gift	✓		≥ MD	≤ \$200 per gift	x	x	Excludes perishables
				> \$200	✓	✓ CEO	
Gift		✓	All	≤ \$50 per gift	x	x	Excludes perishables or gifts to the company (which is to be shared/displayed)
				\$50 < ≤ \$100	✓	✓ MD	
				> \$100	✓	✓ CEO	
Entertainment*	✓		< MD	≤ \$100 per pax	x	x	Events attended by both recipient and giver
				\$100 < ≤ \$500	✓	✓ MD	
				> \$500	✓	✓ CEO	
Entertainment	✓		≥ MD	≤ \$500 per pax	x	x	Excludes perishables
				> \$500	✓	✓ CEO	
Meals	✓		< MD	≤ \$100 per pax	x	x	
				\$100 < ≤ \$300	✓	✓ MD	
				> \$300	✓	✓ CEO	
Meals	✓		≥ MD	≤ \$300 per pax	x	x	
				> \$300	✓	✓ CEO	
Meals*		✓	< MD	≤ \$100 per pax	x	x	
				\$100 < ≤ \$300	✓	✓ MD	
				> \$300	✓	✓ CEO	
Meals		✓	≥ MD	≤ \$300 per pax	x	x	
				> \$300	✓	✓ CEO	
Gift, Entertainment, Meal to GO	✓	✓	< MD	≤ \$50 per	x	x	
				\$50 < ≤ \$100	✓	✓ MD	
				> \$100	✓	✓ CEO	
Gift, Entertainment, Meal to GO	✓	✓	≥ MD	≤ \$100 per	x	x	
				> \$100	✓	✓ CEO	

* MD threshold applies if MD is attending the same event/meal

5.0 REPORTING

5.1 Group Personnel are encouraged to raise concerns about any suspected breaches of the Policy at the earliest possible stage through their Department Head or report such suspected breaches to senior management or the Independent Directors of Baker Technology Limited, without risk of reprisal:



Name	Email Address
Lim Jun Xiong Steven	stevenlim@bakertech.com.sg
Chong Weng Hoe	chongwenghoe@bakertech.com.sg
Ajay Kumar Jain	ajayjain@bakertech.com.sg

- 5.2 Follow-up action will be taken in accordance with the Group Whistleblowing Policy.
- 5.3 Any report will be treated with confidentiality.
- 5.4 Group Personnel acting in good faith will not suffer negative consequences to their employment or retaliation for reporting or for refusing to engage in prohibited conduct, even if such refusal results in loss of business opportunities to the Group.



Revision History

Rev No.	Issue Date	Description of Changes	Clause #	Signature
0	15 Jan 2020	Initial release	N.A.	JC
1	25 Jun 2024	Change of Independent Directors details	Clause 5.1	JC