



# HUMAN RESOURCES POLICY

## ROCKSURE INTERNATIONAL LTD

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<b>POLICY NAME</b>	GIFTS, HOSPITALITY & SPONSORSHIP			<b>POLICY NO.</b>	001
<b>EFFECTIVE DATE</b>	MARCH 2021	<b>DATE OF LAST REVISION</b>		<b>VERSION NO.</b>	
<b>ADMINISTRATOR RESPONSIBLE</b>	HUMAN RESOURCES DEPARTMENT		<b>CONTACT INFORMATION</b>		
<b>APPLIES TO</b> Apply group names to define applicable areas of staff.					
GROUP 1		GROUP 2		GROUP 3	
GROUP 4		GROUP 5		GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR

### ITEM 1.0 APPROVAL AND REVIEW

N/A

### ITEM 2.0 ADDITIONAL NOTES

### ITEM 3.0 SCOPE

Describe to what and to whom this policy applies.

This policy is applicable to all employees and contractors of the company.

## ITEM 4.0 POLICY STATEMENT

Describe the policy and the reason for the policy.

4.1 Rocksure International Limited (RIL) is committed to creating an enabling environment that is ethical, legal and consistent with its values and mission and does not tolerate any act of financial impropriety, corruption or any illegal acts in any of its activities. Where any misconduct of employees has an effect on the image of the company, perpetrators of such illegal activities will face disciplinary sanctions. RIL employees are therefore expected at all times to conduct themselves in the manner that reflects the company's values no matter the contrary practices elsewhere.

4.2 The purpose of this policy is to establish uniformity in the gifting culture within the company and restrict any conflicts of interest.

## ITEM 5.0 TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION

## ITEM 6.0 POLICY SECTIONS

Policy intro:

### ITEM 6.1 GENERAL GUIDELINES

6.1.1 In line with this policy, the company forbids receiving any gifts or seeking for favours from any employee, contractor or associates and their representatives, with whom official business transactions are done.

6.1.2 Employees should make sure that any such gift or favour does not lead to an unfair change of preferences or conflict of interest.

6.1.3 However, as an exception, Human Resources or a Committee formed within the company on certain occasions may seek gifts in the form of sponsorships from contractors for use in corporate-wide events.

### 6.2 EXEMPTION

6.2.1 Gift that of the nature of food, entertainment or accommodation of reasonable value up to \$ 200 or less than 5% of the employee's annual salary or any of the following;

6.2.1.1 Souvenirs

6.2.1.2 Gift under the value of \$ 200

6.2.1.3 Gift in the form of donation or charity accepted with prior approval of the CEO

6.2.1.4 Gift received as a team

6.2.1.5 Gift received as a member of the public

These exemptions will however, not be accepted if management feels that such gifts may influence the employee's actions or perceived to be unfair by the other employees.

### 6.3 GIFT HANDLING PROCEDURE

It is compulsory that on receiving any such gift that does not fulfil the policy the following must be considered;

6.3.1 The employee shall politely request the giver to take it back.

6.3.2 Employee to hand over gifts received to their heads of department or Human Resources

6.3.3 Head of department or Human Resources will take the final decision on the disposal of the gift.

6.3.4 In such a case where it is impractical or discourteous to return the gift, the employee may declare and surrender the gift or favor to the Human Resources as soon as possible.

6.3.5 If the giver or the gift is anonymous, it should be handed over to the head of department or Human Resources who may treat the gift as charity or donation.

6.3.6 In circumstances where the gift involves meals or trips, the employee may accept this only with the prior permission of the CEO. However, such actions should not influence business decisions.

### 6.4 NON-PIU

Breaches on the gift policy are treated as serious misconduct and those found not satisfying the criteria set shall be dealt with accordingly including disciplinary action.

### ITEM 7.0 EXCEPTIONS

Describe exceptions here.

N/A

## ITEM 8.0 RELATED POLICIES AND OTHER REFERENCES

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## ITEM 9.0 ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
9.1 PIU Manager	<p>9.1.1 The PIU Manager will lead the development and regular review of the Gifts, Hospitality &amp; Sponsorship policy, ensuring it aligns with legal requirements and industry standards.</p> <p>9.1.2 Will organize training sessions to educate employees, managers, and relevant stakeholders about the policy's guidelines and restrictions.</p> <p>9.1.3 The PIU Manager will establish a mechanism for tracking gifts, hospitality, and sponsorship activities, conducting audits to identify any potential violations.</p> <p>9.1.4 If violations occur, the PIU Manager will investigate and, if necessary, enforces appropriate disciplinary actions and corrective measures.</p>
9.2 Commercial Manager	<p>9.2.1 Commercial manager will ensure that any sponsorships or business relationships involving gifts or hospitality are thoroughly vetted to avoid conflicts of interest or ethical concerns.</p> <p>9.2.2 Will oversee an approval process for sponsorships and significant hospitality events, ensuring that they align with company values and policies.</p> <p>9.2.3 Commercial manager will maintain transparency in business dealings, avoiding situations that could compromise objectivity due to excessive gifts or hospitality.</p>
9.3 Project Managers	<p>9.3.1 Project managers ensure that project-related sponsorships or hospitality activities are transparent, disclosed appropriately, and do not compromise the integrity of project decisions.</p> <p>9.3.2 Will consider the value and benefits of any proposed sponsorships or hospitality events, ensuring they contribute positively to the project's objectives.</p>
9.4 Human Resources Managers	

	<p>9.4.1 HR manager will educate employees about the Gifts, Hospitality &amp; Sponsorship policy during onboarding and ongoing training to ensure everyone is aware of its provisions.</p> <p>9.4.2 Will establish channels for reporting any instances of gifts, hospitality, or sponsorship that might be perceived as violations of the policy.</p>
9.5 Directors and Senior Management	<p>9.5.1 Directors and senior management will play a crucial role in setting the tone for ethical behavior by adhering to the policy themselves and encouraging others to do the same.</p> <p>9.5.2 Will have authority to approve high-value sponsorships, ensuring that they align with the company's strategic goals and ethical standards.</p>
9.6 Employees	All employees will adhere to the Gifts, Hospitality & Sponsorship policy, report any potential violations, and maintain transparency in their interactions with external parties.

#### ITEM 10.0 CONTACTS

List contacts in the table.

SUBJECT	CONTACT		PHONE	EMAIL