

## **1. Purpose**

The purpose of this policy is to provide clear guidelines on political contributions by the Company and its employees.

## **2. Policy Statement**

**Our Company does not make political contributions.** This includes any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, services or anything of value, to any political party, political candidate, campaign, political action committee, or any political initiative or referendum.

Indirect contributions may include:

- Paying for advertisements, publications, or events that endorse or oppose a political entity or issue.
- Donating goods, services, or facilities to a political entity or event.

## **3. Employee Personal Contributions**

While the Company does not engage in political contributions, we respect our employees' rights to participate in political activities. Employees may make personal political contributions (out of their own personal funds or assets) as part of their individual civic participation, provided these contributions are not made with the intention of assisting the Company in obtaining or retaining business.

## **4. Compliance**

Employees must ensure that their personal political activities and contributions do not involve Company resources and are not conducted during Company time. Employees must also not suggest or imply that their personal political contributions are endorsed by or linked to the Company. Employees should not promote their personal political views during working hours to colleagues, business partners or anyone else with whom they come into contact in their capacity as an employee of the Company.

## **5. Violations**

Violations of this policy may result in disciplinary action, including termination of employment.

## **6. Policy Review**

This policy will be reviewed periodically and may be amended at the discretion of the Company. Any questions relating to this policy should be addressed to either the Director of Risk, Group Company Secretary, Director of Human Resources & Administration or Chief Executive Officer.