



Gifts, Hospitality and Entertainment Policy

PREFACE

All employees and consultants of Larus Energy Limited (Larus Energy) are required to work within the policy set out below.

In deciding whether to accept gifts, hospitality or entertainment employees, contractors and consultants (personnel) will adhere to and be guided by the following principles:

1. personnel must not solicit or accept any gifts, hospitality or entertainment, the receipt or expectation of which might in any way tend to influence, or appear to tend to influence, the individual in his or her official capacity.
2. if any substantial gift, offer or suggestion of such is made directly or indirectly to personnel, the facts shall be reported at the first opportunity to their line management and document using 'Form XYZ'
3. personnel must avoid all situations in which the appearance may be created that any person or body, through the provision of gift, hospitality or entertainment of any kind is securing, or attempting to secure, the influence or favour of the personnel involved, and
4. personnel must take all reasonable steps to ensure that their spouse, children or dependents, or subordinate staff members are not the recipients of gifts, hospitality or entertainment which could give the appearance of an indirect attempt to secure the influence or favour of personnel.

GENERAL STATEMENT OF INTENT

At Larus Energy it is the responsibility of employees to make decisions according to the principles and best interests of the company. Perceptions of bias may arise if personnel are seen to accept gifts, hospitality or entertainment from external parties who may stand to gain or benefit from decisions or actions of company personnel

MEANS

Larus Energy will manage its policy in relation to receipt of gifts and benefits through the following means: -

1. publication of this Policy with related guidelines in relation to what is and is not acceptable.
2. all gifts and benefits offered, received or declined MUST be declared to line management and



recorded.

3. where necessary prior approvals will be obtained from appropriate authorities; and
4. the Company will maintain a register of gifts and benefits, noting the donor, recipient name and position, whether the gift was accepted or not and details relating to acceptance has been approved or otherwise

APPLICABILITY

This policy applies to all COMPANY personnel at all times.

REVIEW STATEMENT

This Policy will be periodically reviewed alongside quarterly review by an appropriate Executive of the Gifts and Entertainment register.

REFERENCE POLICIES and DOCUMENTATION

- Code of Conduct
- Anti Bribery and Corruption Policy
- Whistleblower procedures
- Personnel Employment or Engagement Contract

Reviewed and Acknowledged:

Name: Richard Gazal

Position: Chairman

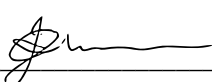
Date:

Signature: _____


Name: John Chambers

Position: Managing Director

Date:

Signature: _____




A Gifts and Entertainment form helps SMEs document, declare, and obtain approval for gifts, hospitality, or entertainment to ensure compliance and transparency.

Purpose

The form is designed to:

- Capture details of gifts or entertaining offers (given or received) to prevent conflicts of interest.
- Ensure pre-approval for items exceeding defined value limits.
- [Support transparent reporting for compliance with company policies and applicable laws](#)

Sample Form Fields

1. Employee Information

- Name, Position, Department
- Contact Information
- Report Date

2. Gift/Entertainment Details

- Item/Activity Description (e.g., dinner, event tickets, product)
- Date Offered or Received
- Offered To / Received From (Name, Position, Organization)
- Type of Organization (Supplier, Client, Govt / Regulatory / JV / Employee / Other)
- Reason for Gift/Entertainment (e.g., token of appreciation, milestone, business meeting)
- [Estimated Value \(and cumulative value from / to the same source in the last 12 months\)](#)

3. Approval and Decision

- Acceptance Status:
 1. Declined / Accepted with prior approval
 2. Accepted without prior approval
 3. Accepted and donated to others
- Manager or Supervisor Approval: Name, Signature, Date



- Compliance Review (if required): Attendees, Notes, Decision, Signature
- [Supporting Documentation Upload \(optional for digital forms\)](#)

4. Post-Approval Actions

- Remedial Action (if applicable)
- How gifted items are disposed of or donated if not retained
- [Tracking of cumulative gifts for reporting purposes](#)

Workflow Considerations

- **Auto-approval for low-value items (under \$250 USD)**
- **Automatic decline or Line Manager approval for High Value items (> \$250 USD)**
- **Automatic decline for repeat or similar frequency from same source > 3 events PA (to same person / across organisation subject to review)**
- **Automatic decline at sensitive periods (example: when relevant sourcing, tendering, negotiations, claims underway)**
- **Gifts above certain value (> \$250 USD) from sensitive stakeholders to be donated to or internally raffled / other actions as determined by management**
- [Include links to the company Code of Conduct or Gift Policy for reference](#)