



# Putprop



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## GIFT POLICY

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Gift Policy Version: 1

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Last Review Date: 19/02/2026

Frequency of Review: As Required

Next Review Date: As Required Policy Owner: Darryl Mayers

Responsible Business Unit: Administration

## POLICY STATEMENT

This policy forms part of the policy owner's internal business processes and procedures.

Any reference to the "organization" shall be interpreted to include the "policy owner". The organization's governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organization are required to familiarize themselves with the policy's requirements and undertake to comply with the stated processes and procedures.

Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

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### Directors:

Darryl Mayers\* | Alicia Nolte@ | Hayden Hartley## | René Styber##

\*Chief Executive Officer | @Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





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## 1. PURPOSE

- To establish clear ethical lines with employees within the organization, promoting good judgement, and avoiding conflict of interest when accepting a gift
- Provide guidance to management to manage gifts received and accepted by employees
- Standardize the management of gifts

## 2. SCOPE/APPLICATION

This policy applies to all elected and appointed officials, as well as all employees of Putprop Ltd.

## 3. DEFINITIONS

### 3.1 Employees

Includes those charged with governance, directors and non-executive directors, all permanent, part-time, temporary, and contract employees and volunteers.

### 3.2 Gift

Any bestowal of money, any item of value, service, loan, thing or promise, discount or rebate for which something of equal or greater value is not exchanged in the line of work. This includes but are not limited to stationary, marketing material/branded goods, alcohol, third-party donations, meals, vouchers indulgences, hunting trips, weekend breaks, holidays, tickets to sporting events and/or other events or productions.

“Gift” does not include

- 1) any discount or rebate made in the regular course of business and offered to the public without regard to the individual’s connection with the organization,
- 2) inheritances,
- 3) plaques or trophies, and
- 4) campaign contributions.

## 4. ACCEPTANCE CONSIDERATIONS

Before deciding to accept or reject a gift, the relevant individual must decide if it will be in the interest of Putprop to accept the gift and if there is any risk that acceptance may influence his/her actions and future decision-making.

The following issues should be considered before accepting the gift:

- Intentions of the person providing the gift (appreciation, relationship building etc.)
- Timing of the gift
- Value of the gift, individual or in aggregate of multiple gifts given at the same time

## 5. RULES FOR ACCEPTANCE OF GIFTS

All employees and persons acting on behalf of the organization will at all times be subject to, and act in accordance with, the following guiding principles:

### 5.1 Gifts in cash or EFT transfer

- Gifts of this nature is strictly prohibited and may not be accepted.
- Must be reported to whistleblower@putprop.co.za

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## 5.2 Gifts with a value of less than R1,000

- Gifts with a value of less than R1,000 may be accepted without prior approval.
- Must be reported in Putprop Ltd's gift register

## 5.3 Gift with a value less than R1,000 that are considered marketing material.

- Gifts with a value of less than R1,000 that are considered marketing material may be accepted without prior approval.
- This includes but is not limited to calendars, diaries, branded clothing etc.
- Must be reported in Putprop Ltd's gift register

## 5.4 Gift with a value less than R2,000 that are not considered marketing material.

- Requires the approval of any Executive Director
- Must be reported in Putprop Ltd's gift register

## 5.5 Gifts with a value greater than R2,000

- Requires the CEO/CFO or Chairman's (in case of CEO/CFO) pre-approval
- Must be reported in Putprop Ltd's gift register

## 5.6 Gifts with a value greater than R10,000

- Any gift with a value of R10,000 or greater is strictly prohibited and may not be accepted.

## 6. RULES FOR GIVING OF GIFTS

All employees and persons acting on behalf of the organization will at all times be subject to, and act in accordance with, the following guiding principles:

### 6.1 Gifts in cash or EFT transfer

- Gifts of this nature are strictly prohibited and may not be accepted.
- Must be reported to [whistleblower@putprop.co.za](mailto:whistleblower@putprop.co.za)

### 6.2 Gifts with a value less than R2,000

- Requires any executive directors pre-approval
- Must be reported in Putprop Ltd's gift register

### 6.3 Gifts with a value greater than R2,000

- Requires the CEO/CFO or Chairman's (in case of CEO/CFO) pre-approval
- Must be reported in Putprop Ltd's gift register

### 6.4 Gifts with a value greater than R10,000

- Any gift with a value of R10,000 or greater is strictly prohibited and may not be accepted.

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