

OROTON GIFTS Policy

Oroton is committed to conducting its business with the highest standards of integrity and will only work with suppliers who share and follow our high standards of ethical business behavior and who demonstrate commitment to those standards.

At Oroton, we value the strong partnerships we build with our Vendors and all those involved in the manufacture of our products. We recognise that at times, our team members may be offered gifts, gratuities, hospitality and offers of entertainment from our Vendor and factory partners.

This Gifts & Gratuities Policy has been provided to ensure a clear understanding for all parties and any actions or outcomes arising from a potential breach of this Policy.

Oroton defines a Gift as "a thing or item given willingly to someone without payment" and a Gratuity as "an amount of money or equivalent tender for someone who has provided you with a service for their personal use".

Offered Gifts and Gratuities to our team members may include things such as (but not limited to) meals, material goods, travel, accommodation, tickets to sporting or cultural events, outings, and any other merchandise such as electronics or services given. Items given to a team member which are given as cash or equivalent (gift cards etc.) are still be classed as a Gift or Gratuity for the purpose of this Policy.

This Policy applies to all vendors, factories or authorised sub-contractors ("suppliers") in all Regions involved in the manufacturing of Oroton proprietary branded and licensed merchandise sold by Oroton or any authorised seller.

Our team members are empowered to make sound business judgement when offered a gift or gratuity by a Vendor, Factory or Sub-Contractor as a part of their employment with Oroton.

It is strictly prohibited to offer, give, demand or accept any undue advantage (such as money, favors, gifts, discounts, services, loans, contracts etc.) to or from any person in order to obtain or retain business or other improper advantage.

As a general guide, Oroton team Members may not accept a gift or any other item that has a market value of \$50 USD or greater.

The giving of gifts and gratuities to Oroton team members by Vendors, Factories or Sub-Contractors may include (but is not limited to):

- Cash or cash equivalents such as gift cards;
- A gift or activity that is not in good business taste or aligned to Oroton values;
- Any activity that involves gambling (horse racing, casinos etc.);
- Any activity that involves any form of prostitution or any similar activity;
- During any contract negotiation periods with Oroton;

All gifts and gratuities, including those declined by Oroton team member must be disclosed to the team members direct manager immediately upon becoming aware of a gift or gratuity being offered.

Oroton will monitor compliance to this Policy and our Ethical Sourcing Policy and we or our representatives, may visit a supplier's factories to audit compliance of any part of this Policy to ensure our business expectations are being upheld. These visits may occur at any time and be announced or unannounced.

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Oroton always expects suppliers to co-operate, to be honest and transparent in their dealings with Oroton and commit to making continuous improvements in their operations. Any breaches of this Policy or our Ethical Sourcing Policy will be reported to the supplier for follow up and corrective action. Where there are breaches and/or the supplier does not demonstrate a willingness to comply, Oroton reserves the right to discontinue business with the supplier.

This Oroton Policy and Ethical Sourcing Code does not replace the local laws of the countries in which our suppliers operate. At a minimum, suppliers should always be familiar with and comply with all relevant laws and regulations. In the event of a conflict between these standards and a local law, the stricter requirement must be followed.

The complete Oroton Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting www.orotongroup.com

This Policy should be applied with all Oroton Policies and social compliance expectations and operates within the legal and regulatory requirements of the Country in which Oroton, our Suppliers and Sub-Contractors operate.