



No Gifts and Entertainment Policy

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1. Purpose

- 1.1 PT DFI Retail Nusantara Tbk and its affiliates ("**DFI Nusantara Group**") are committed to ensuring that relationships with our suppliers and business partners are ethical, transparent, and conducted with integrity.
- 1.2 Examples of suppliers and business partners include: distributors, resellers, product or service suppliers, subcontractors, manufacturer representatives, landowners, law firms, audit firms, tax advisors, banks, brokers and consultants, recruitment firms, joint venture partners, and agents providing products or services to DFI Nusantara Group, among others. DFI franchisees are also considered business partners.
- 1.3 The purpose of this No Gifts and Entertainment Policy ("**Policy**") is to establish rules and guidelines regarding the following four areas from suppliers and business partners:
 - (a). acceptance of gifts;
 - (b). acceptance of product samples;
 - (c). entertainment invitations; and
 - (d). travel and accommodation invitations.
- 1.4 In the event of a conflict between this Policy and DFI NUSANTARA Group Code of Conduct, the provisions of this Policy shall prevail.

2. Policy

- 2.1 Unless expressly permitted under this Policy, DFI NUSANTARA Group prohibits the acceptance of gifts or entertainment, travel, and accommodation paid for by a supplier or business partner.
- 2.2 Under no circumstances may team members solicit gifts, entertainment, travel, accommodation, or donations from suppliers or business partners. Cash or cash equivalents in any form must not be accepted.
- 2.3 For information regarding prohibited payments or offers to suppliers and public officials, please refer to DFI NUSANTARA Group Anti-Corruption Policy.

3. Who is Subject to This Policy?

- 3.1 All employees of DFI NUSANTARA Group, including full-time, part-time, contract, and temporary employees at all levels, as well as anyone acting on the instructions of DFI NUSANTARA Group within DFI NUSANTARA Group and majority-owned or controlled subsidiaries and affiliates.
- 3.2 DFI Nusantara Group and its Business Units. For clarification, as long as Jardines is the majority shareholder of DFI NUSANTARA Group, gifts given by Jardines and/or its business units, or the attendance of our team members at events or entertainment hosted by them, are permitted under this Policy.
- 3.3 Official Capacity in Joint Ventures ("JV"). Under this Policy, our team members are permitted to attend meetings or events of such JV (including if meals are provided) provided our team member holds an official position in the JV and all costs and expenses are borne by the JV. For example, attending a JV board meeting or participating in a JV-hosted event as a director of that JV accompanied by a meal. This provision applies only if the JV partner does not also have the capacity as a supplier of products or services to DFI NUSANTARA Group (e.g., being a property owner or Information Technology service provider to DFI NUSANTARA Group).
- 3.4 DFI NUSANTARA Group Franchisees: DFI NUSANTARA Group franchisees are considered business partners for the purposes of this Policy.

4. Rules Regarding Gifts

- 4.1 No Gifts from Suppliers or Business Partners: Team members must not solicit gifts (e.g., ask for or request) nor accept gifts offered by suppliers or business partners.

- 4.2 What Constitutes a Gift? Gifts include cash or cash equivalents in any form, discounts, services, shares, or promotional expenses of any value. Examples of gifts include food (e.g., hampers) and alcoholic beverages.
- 4.3 Items Excluded from the Definition of Gifts:
- (a) Gifts received by a team member in connection with an internal event or competition related to work at DFI NUSANTARA Group.
 - (b) Promotional items given to team members at internal DFI NUSANTARA Group events.
- 4.4 Steps to Be Taken Regarding Gifts:
- (a) Team members must actively promote this Policy to suppliers and business partners, and this policy must be part of the Supplier Code of Conduct sent to suppliers and business partners. Team members are advised to send reminders about this Policy to inform suppliers and business partners in writing, preferably before festive periods and in any case at least once a year.
 - (b) If a team member receives a gift from a supplier or business partner, that team member must inform their direct manager. The gift must be returned to that supplier or business partner or, if it is believed that returning it could offend the giver, the gift must be stored in a gift/sample storage room provided for that purpose at the discretion of the direct manager.
 - (c) Each quarter, a sale of gifts/samples should preferably be conducted with all proceeds (if any) donated to a designated charity and/or a raffle at the business unit/function level for participating team members.
 - (d) Team members who receive gifts must record them in the Gifts and Entertainment Register Form, noting the method of transfer/disposal of the gift.
 - (e) Under no circumstances may a team member who receives a gift accept or derive benefit from the gift unless won in a raffle as described in Section 4.4(c) above.

5. Rules Regarding Samples

- 5.1 Samples provided for the purpose of assessing a product's suitability for sale by the buying team or for technical or quality assessment by DFI NUSANTARA Group Group Technical Team are not considered Gifts, provided they are delivered to the relevant team member's workplace and in reasonable quantities. Subject to Section 5.2 below, the quantity of product samples offered or requested should be limited to the level necessary to perform such assessment.
- 5.2 Any requirement for a large quantity of samples exceeding that level, either for further trials or distribution of samples at an internal DFI NUSANTARA Group event in accordance with Section 4.4(c) above, must have written approval from the respective line manager.
- 5.3 Samples received outside the responsibility of the buying team or Group Technical Team should be handed over to the relevant buying team or Group Technical Team for that product, and the line manager should be informed.
- 5.4 The buying teams and Group Technical Team are generally expected to conduct their business activities in the workplace and adhere to established policies and procedures. Taking samples out of the Store Support Centre (e.g., taking them home) is not advisable unless testing must be done at home (e.g., testing shampoo or cooking for pasta products). The quantity of samples taken out of the Store Support Centre for testing must be limited to the level necessary to assess the product's suitability for sale or technical/quality assessment by DFI NUSANTARA Group, and any excessive taking or for personal consumption is not permitted.
- 5.5 For the first production of DFI NUSANTARA Group Own Brand products, the relevant Own Brand director must approve the distribution of samples to team members for testing purposes, limited to one sample per member. Taking these samples out of the Store Support Centre is also not advisable unless testing must be done at home.
- 5.6 Any leftover or excess samples from the buying team, Group Technical team, or Own Brand team must be placed in the provided gift/sample storage room for sale and/or raffle, as explained in Section 4.4 (Steps to be taken regarding Gifts) above.

6. Rules Regarding Entertainment

6.1 No Entertainment from Suppliers or Business Partners:

- (a) Team members must not accept any form of Entertainment from suppliers or business partners.
- (b) Under no circumstances may a team member solicit an offer to attend Entertainment funded by a supplier or business partner. This includes requesting tickets for yourself if you were not invited, or requesting tickets for others (including your family) who were also not invited.

6.2 What Constitutes Entertainment?

Any form of time spent with a supplier or business partner involving shared meals, drinks, sporting events, theater or musical performances, trade fairs, conferences, or other forms of hospitality.

6.3 Items Not Considered Entertainment:

- (a) Visits to Supplier/Business Partner Offices or Laboratories: Simple lunches and non-alcoholic beverages provided by a supplier or business partner during meetings held solely at their location or at a third-party laboratory, in situations where it is difficult to purchase food or when consumption of such food/drink occurs during the meeting to save time.
- (b) Educational Events: Attending or speaking at an event attended by participants other than from DFI NUSANTARA Group, where the primary purpose is professional, technical, or educational—e.g., a morning seminar on accounting or attending a keynote speech where food is provided for all attendees and not specifically for DFI NUSANTARA Group is not considered Entertainment in the context of this Policy. However, prior approval from the line manager is still required to attend such an event.
- (c) Paying for Yourself and/or Even Supplier/Business Partner Costs: No specific prior approval is required for brief meetings with suppliers and business partners for work purposes where each participant pays their own costs separately or DFI NUSANTARA Group participant covers the entire cost. However, approval from the line manager is still required for the reimbursement process in accordance with DFI NUSANTARA Group expense reimbursement policies and procedures.

7. Rules Regarding Travel and Accommodation

7.1 No Acceptance of Free Travel and Accommodation from Suppliers or Business Partners: Team members must not accept offers of free travel or accommodation from suppliers or business partners in any form.

7.2 Items Not Considered Travel and Accommodation:

- (a) Visits to Suppliers and Business Partners for Technical Audits Only: Accommodation and travel costs (excluding Entertainment) incurred when visiting suppliers and business partners (both domestic and international) by the Group Technical Team in the course of normal business needs may be paid for by the supplier or business partner if:
 - (i) DFI NUSANTARA Group first selects the mode of transport and accommodation in accordance with DFI NUSANTARA Group Travel & Expenses policy;
 - (ii) The supplier approves in advance and the Director of Group Technical approves the choice of transport and accommodation;
 - (iii) The supplier may then proceed to book and pay;
 - (iv) DFI NUSANTARA Group team member must retain and archive copies of transport tickets (such as flight tickets and train tickets) and hotel bills (see Section 12 below).

8. Donations, Bribe Offers, and Gifts from Third Parties

8.1 No Acceptance of Donations from Suppliers or Business Partners. Under no circumstances may a team member solicit or accept donations from suppliers or business partners.

- 8.2 Bribe Offers. Any offer of a bribe or commission given by a third party or any party dealing with DFI NUSANTARA Group must be refused and immediately reported to the relevant member of Management and to DFI NUSANTARA Group Group Counsel.
- 8.3 Product Donations to External Parties. Any request from a third party for product donations from DFI NUSANTARA Group requires prior written approval from the relevant member of Management and DFI NUSANTARA Group Group Counsel.

9. Summary of Exception Approvals

9.1 Any exception to this Policy requires written approval as explained below:

Item Provided by Supplier or Business Partner / Other Item	Value	Exception Approval	
Gifts	Any	Not permitted and subject to procedure in Section 4.4 above if cannot be returned.	
Samples	Any	<p>Any requirement for a large quantity of samples exceeding the level mentioned in Section 5.1 above, either for further trial purposes or distribution of samples at an internal DFI NUSANTARA Group event as referred to in Section 4.4(c), must obtain written authorization from the respective line manager.</p> <p>Approval from the relevant Own Brand director must be obtained before such first production samples can be distributed to team members for testing purposes.</p>	
Entertainment	Any	<p>Applicant: Group Chief Executive Approval Required From: Group Chief Legal Officer</p> <p>Applicant: Other members of Management Approval Required From: Group Chief Executive</p> <p>Applicant: Other team members except those mentioned above Approval Required From: Relevant member of Management and DFI NUSANTARA Group Group Counsel</p> <p>The applicant must record prior approval in the Gifts and Entertainment Register.</p>	
Entertainment	Any	Applicant: Group Chief Executive	Approval is required from: Group Chief Legal Officer
		Other members of Management	Group Chief Executive
		Other team members except those mentioned above	Relevant members of Management and Group Counsel DFI NUSANTARA Group
		Applicants must record prior approval on the Gifts and Entertainment Register.	
Travel and Accommodation	Any	Not permitted except for the exception set out in Section 7.2 above.	
Product Donations to External Parties	Any	Any request from a third party for product donations from DFI NUSANTARA Group requires prior written approval from the relevant member of Management.	

10. Policy Violation

Any violation of this Policy will be considered a serious offense and will be subject to disciplinary action, which may include termination of employment or termination of the contractual agreement.

11. Report Your Concerns

- 11.1 We all have a responsibility to report any potential violations of this Policy. If you become aware of a potential violation, you can report it to your direct supervisor or line manager, Head of People & Culture, or Head of Legal in your business unit/department or at the Group level. You can also submit a report via one of the Speak Up channels as stipulated in the Speak Up Policy.
- 11.2 The telephone hotline, portal, and email account are operated by an independent and trusted external provider committed to maintaining the confidentiality of all reports and the anonymity of involved reporters.

12. Archiving and Record Retention

- 12.1 For the recording of Gifts as explained in Section 4.4(d) and Entertainment in Section 9, the applying team member is responsible for keeping a record of such request and decision in the form of the Gifts and Entertainment Register via the following link or by scanning the QR link code: <https://bit.ly/GiftandEntertainmentDeclarationForm> and QR Code:  and sharing it with People & Culture Business Partners for record-keeping purposes.
- 12.2 Records under this Policy must be retained for at least two years.

Policy Updates and Interpretation

- 13.1 This Policy will be updated by the Policy Owner from time to time. Any questions related to this Policy should be referred to the Policy Owner.
- 13.2 If there is any discrepancy in interpretation, the English version shall prevail.