

# INDUCEMENT POLICY

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Receiving gifts or entertainment from individuals or firms having business dealings with Ingleby creates the potential for conflicts of interest. For this reason, it is expected that all Board members, officers and staff will exercise good judgement in considering the value, frequency and intent of gifts and entertainment. If doubts on the regard arise, they should consult with the CEO before accepting.

All Board members, officers or staff should report details of any gifts or benefits in kind over US\$ 200 in value. Ingleby shall keep record of these for 5 years after cessation of the relevant individual's employment.

It is Ingleby's policy not to offer any substantial gifts, or any material entertainment and benefits in kind to individuals or firms with whom it deals.

An Inducements (Gifts) Register shall be kept by Ingleby, while Board members, officers and staff shall be responsible for making the necessary declarations.