



GIFT POLICY EXTRACT FROM AISL CODE OF CONDUCT

Exchange of Gifts and Business Hospitality

- Exchange of gifts and business hospitality may be common business practices; however, such activity can be misinterpreted or suggest the appearance of something improper, even when there is no improper intent.
- You must not accept any entertainment, gift, money, sumptuous meals from parents of any prospective or enrolled students.
- You must avoid conflict of interest situations, actual or potential, which may compromise your integrity and put the Group's interests or reputation at stake.
- You must decline entertainment, gifts, or other benefits that could in any way influence, or appear to influence, business decisions in favour of any person or organisation with whom the Group may have business dealings.
- You must also decline to accept advantages offered in connection with business transactions unless the advantages are of nominal and non-cash value, such as promotional or advertising souvenirs. Anyone who receives or is offered a gift must adhere to the following procedure:
 - You should report to your line manager and the Director of Finance to seek approval on receipt of any gifts and benefits with the assessed value above HK\$500/GBP50/RMB400. Employees at Head Office should report to the functional department head.
 - If the assessed value is between HK\$2,000/GBP200/RMB1,600 to HK\$5,000/GBP500/RMB4,000, you should submit the designated reporting form and seek the approval from the Head of School, the Chinese Principal and the Director of Finance. Employees at Head Office should report to the Chief Financial Officer.
 - If the assessed value is more than HK\$5,000/GBP500/RMB4,000, you should report to the Chief Education Officer and seek his approval. Employees at Head Office should report to the Chief Executive Officer.
- If an employee fails to report the receipt/offer of any gift/benefit from any person/organisation with business dealings with the Group in accordance with the Code (or any applicable law or the Group's policy in force from time to time), he/she may result in a disciplinary action up to and including termination of employment.
- You must avoid offering gifts to specific individuals; instead, gifts may be offered to the company for which such individuals work for on occasions when it is appropriate, out of courtesy and to maintain business relationship. Corporate souvenirs are preferred. Gifts must not be in the form of cash.
- For entertainment, company functions are preferred over entertaining individuals. In both cases, these entertainments must be offered only in connection with legitimate business interests and purposes. You must decline to accept and refrain from issuing invitations to meals or entertainment that are excessive in monetary value or too frequent. Proper use of budget, approval, record-keeping and documentation procedures must be made when expensing business gifts and entertainment.
- You are also under an obligation to ensure agents or others providing gifts or entertainment on the Group's behalf to follow our guidelines. When dealing with organisations or government/public sector corporations that have more restrictive limits or prohibitions against accepting business gifts and entertainment, you must abide by their standards.