



DAGON INTERNATIONAL LTD

DOCUMENT NO:	DIL 014/2018	
DOCUMENT TITLE:	DONATION POLICY	
DATE:	08-08- 2018	REVISION NO: 001

Donation Policy

1. Policy

All Donations provided by the Company (be they in cash or kind) must be compatible with business activities and reflect the commitment to operating in an ethical manner. Donations will not be given to organizations that the Company is in illegal or financial conflict with or which connects the Company to any political party or group. This policy does not apply to sponsorship.

2. Scope

This policy applies to all Employees and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

(i) Charitable donations by the Company may only be made where:

- the donation is made in compliance with applicable laws;
- the donation is not made to secure an improper business advantage; and
- the donation is made to a properly established charity and there is a valid charitable purpose for the donation.

(ii) The Officers meeting will approve an annual donations budget of funds or goods to be donated.

All donations, whether in cash or in kind, must approved by the Officers Meeting

Any use of the Company logo or trademarks must be referred for approval.

(iii) The company will only make donations to non-profit legal entities (institutions or organizations) that are duly registered with the competent authorities of the country.

Donations to natural persons or legal entities of a political nature (political parties or funders of political campaigns) are prohibited.

(iv) Donations must not be made or offered in conjunction with, as part of or in relation to any bid, tender, contract renewal or prospective business relationship.

(v) The Company will not enter into any charitable Donation agreement with an organization as a means of gaining favourable terms from that organization or its affiliates/connected parties in any other business agreements.

(vi) Charitable sectors are:

- 1) Humanitarian charities
- 2) Disaster relief charities
- 3) Environmental charities
- 4) Health charities
- 5) Education charities

Total donations should not exceed USD 50,000 per annum.



3. Qualifying donations

To qualify for the donation tax deduction, your corporation must make a donation to a qualified recipient. Qualified recipients are generally those organizations which can issue donation receipts for the gifts received from individuals or corporations. They can be charitable organizations, public foundations or private foundations. Typically, a registered charity is a qualified recipient. In this article, the terms qualified and registered charities are used interchangeably.

4. Responsibilities

- Ensure any Donation is compatible with the Company's values and ethical compliance such as the Anti-Corruption agreement
- All Donations must be approved by the CRO and reported to the officers' meeting. A record of all Donations should be maintained for audit purposes.
- Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- All Employees have the responsibility to read, understand and comply with this policy. Employees should avoid any activity at all times that might lead to a breach of this policy.
- This policy should be read in conjunction with the Company's Anti - Corruption agreement, Entertainment rule, Purchasing rules and Code of Ethics.
- Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their officer or other available reporting mechanisms.
- The donation certificate is handed to DAGON after donation.

5. Monitoring and Review

- The Company will establish and put in place appropriate performance measures and reporting systems to monitor performance against metrics and compliance with the relevant policies, procedures and controls.
- The management will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.
- Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective.
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