



# TRI-STAR INDUSTRIES PTE LTD

Business Registration No.: 197903453H  
36 Joo Koon Road, Singapore 628988  
Tel: (65) 6266 3636 Fax: (65) 6265 3635  
website: www.tristar.com.sg Email: sales@tristar.com.sg

## **GIFTS AND SPONSORSHIP ACCEPTANCE POLICY**

### **1. PURPOSE**

This policy sets out clear guidelines for the acceptance and offering of gifts and sponsorships by Tri-Star Industries employees and representatives. It aims to promote transparency, prevent actual or perceived conflicts of interest, and uphold TSI's integrity and compliance with applicable anti-bribery and corruption laws in Singapore and other jurisdictions where we operate.

### **2. SCOPE**

This policy applies to all employees, officers, directors, and third-party representatives of TSI Group across all locations.

### **3. RECEIVING GIFTS FROM BUSINESS ASSOCIATES**

#### **3.1 General Principles**

- Employees must exercise sound judgment and discretion when receiving gifts from clients, vendors, or other external parties.
- Gifts should never influence, or appear to influence, business decisions.
- Under no circumstances should gifts be solicited.
- Any gift that may give rise to a conflict of interest or violate the Prevention of Corruption Act (Chapter 241) is strictly prohibited.

#### **3.2 Classification and Handling of Gifts**

##### **3.2.1 Festive Gifts**

Gifts received during recognized festive seasons (e.g., Chinese New Year, Hari Raya, Deepavali, Christmas) must be:

- Handed over to the Administration Department upon receipt.
- Consolidated and equitably distributed to employees at management's discretion.



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## 3.2.2 Perishable Gifts

Items such as food, fruits, or confectioneries—regardless of occasion—may be:

- Shared informally within the relevant department or team.
- The recipient's department head must be notified for transparency.

## 3.2.3 Non-Festive, Non-Perishable Gifts

Items given outside of festive periods (e.g., corporate merchandise, personal gifts):

- Must be submitted to the Administration Department for evaluation.
- The Head of Administration will determine whether to redistribute, display, or decline such gifts in the best interest of the Company.

## 4. PROVIDING GIFTS OR SPONSORSHIP TO EXTERNAL PARTIES

### 4.1 Sponsorships and Corporate Gifts

TSI may offer sponsorships or business gifts only when:

- It is done transparently and in compliance with relevant policies and laws.
- It supports legitimate business development or community engagement.
- It does not create any undue influence or expectation of reciprocity.

### 4.2 Evaluation Criteria

All sponsorships and gift-giving proposals must be reviewed and approved by senior management. The following criteria must be considered:

- 4.2.1 History of service or partnership with TSI
- 4.2.2 Alignment with TSI's values and business goals
- 4.2.3 Measurable benefits and business impact
- 4.2.4 Opportunities for sustainable and long-term collaboration
- 4.2.5 Branding and public relations value
- 4.2.6 Risk assessment and reputational considerations



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Note: High-value gifts or sponsorships exceeding a defined monetary threshold must receive prior written approval from the Chief Executive Officer.

## 5. COMPLIANCE AND DISCLOSURE

- Employees must disclose to their reporting manager any gift received or intended to be given that may exceed customary or nominal value.
- All gifts or sponsorships above [suggested value: S\$100] must be recorded in a Gift & Sponsorship Register maintained by the Admin Department.
- Breach of this policy may result in disciplinary action, including termination, and referral to relevant authorities where necessary.

## 6. POLICY REVIEW AND UPDATES

This policy will be reviewed periodically and updated as required to ensure relevance and compliance with applicable laws and internal governance. Any changes will be communicated to all staff and stakeholders promptly.

  
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**PERRY LIM**  
CHIEF EXECUTIVE OFFICER