



## **Gifts, Benefits & Entertainment**

It is Capral's practice to discourage employees from accepting offers of gifts, benefits and entertainment as this may be misconstrued as an attempt to influence business decisions. The Company expects each employee to exercise reasonable judgment and discretion in accepting any gratuity, entertainment activity or gift offered to the employee in connection with employment at Capral.

Gifts of nominal value and unsolicited promotional materials of a general advertising nature are permitted, provided they are given as a gesture of professional friendship and do not involve a Company commitment having to do with the transaction of business. Employees should ensure that they make their manager aware of any such gifts received. If in any doubt about whether a gift should be accepted or not, employees should seek their manager's advice.

On occasion, some employees may be required to entertain clients and business associates and to accept offers of entertainment in return. The appropriateness of entertainment is dependant upon the existence of a business relationship that could benefit the Company.

Valid entertainment expenses include meals and events taken with potential or actual clients where a business discussion takes place during, immediately before or immediately after the event.

As employees, you must ensure that you are not influenced by gifts or favours of any kind from suppliers, clients and customers or potential suppliers, clients and customers. In no event should you accept a gift or offer of entertainment from a supplier, client or customer or potential supplier, client or customer during or in connection with contract negotiations.

It is never acceptable to solicit gifts, entertainment activities, gratuities or business courtesies for the benefit of a Capral employee, family member or friend.

31 December 2005