

# Political contributions and charitable donations policy

## Political Contributions

All contributions to political parties, campaigning organisations, individual politicians, or political candidates are prohibited unless approved in writing by the CEO.

- All Political Contributions will be registered and/or publicised in accordance with the law of the country to which the political donation relates.
- All Political Contributions will be individually declared in the annual report of SEA.
- In every case where a Political Contribution is made, an assessment should be made of any reputational and ethical risks that may arise. In particular, requests for political contributions should be examined with care in case they are an attempted disguise for bribery. Specific steps to be taken include the following:
  - a) Check that that the recipient is registered under the laws of the local country;
  - b) Check that the proposed recipient is not connected to any other business or to any politician or person who may have influence over any transaction in which SEA is interested.

## Charitable Donations

In every case where a charitable donation exceeding Kc 10,000.00 is made, a risk assessment should be made of any reputational and ethical risks that may arise. In particular, requests for charitable contributions should be examined with care in case they are an attempted disguise for bribery. Specific steps to be taken include the following:

- Check that that the charity is registered under the laws of the local country;
- Carry out due diligence to ensure that the proposed charity is not connected to any other business or to any politician or person who may have influence over any transaction in which SEA is interested;
- Make full enquiries as to the purpose/use for the donations;
- Exercise caution where a donation is proposed as part of a business deal;
- Always pay donations directly to the charity in question;
- Always obtain a receipt for any donation;
- Always record the donation fully in the relevant accounts and records.



Frantisek Plachy  
Managing Director  
SEA Enterprises a.s.