

## Philanthropy, Charity, and Donations Policy



### 1. Purpose

At Clemark Group we believe in giving back to the communities in which we operate. Our Philanthropy, Charity and Donations Policy outlines the principles and guidelines governing our charitable giving efforts. This policy serves to uphold our commitment to social responsibility and to ensure that our philanthropic endeavours align with our values and strategic objectives.

### 2. Scope

This policy applies to all charitable contributions made by Clemark Group and associated companies, including but not limited to cash donations, goods, services, or employee volunteered time.

### 3. Principles

- **Community Impact:** Our philanthropic efforts aim to make a positive and measurable impact on the communities we serve.
- **Transparency:** We are committed to transparency in our charitable giving activities, ensuring accountability and openness.
- **Alignment:** Our charitable contributions align with our company values, and strategic goals.

Find Out More: <https://www.clemarkgroup.com/together/>

- **Inclusivity:** We support equality, diversity and inclusivity in our philanthropic endeavours, seeking to address a broad range of social, environmental, and humanitarian issues.
- **Preference for Local Non-profit Organizations:** While we consider charitable requests from various organisations, our preference is to support small local non-profit organisations that directly benefit our communities.
- **Accountability:** We conduct due diligence on the organisations we give to, ensuring that our intended outcomes can be met.

#### 4. Types of Contributions

We may provide support in the following forms:

- Cash donations,
- Fundraising initiatives,
- In-kind donations of goods or services.
- Volunteer time and expertise.
- Donating via online giving pages.

#### 5. Process for Charitable Contributions

- **Submission of Requests:** Charitable organisations seeking support can submit a formal request detailing their mission, programs, and intended use of the contribution.
- **Evaluation Criteria:** Contributions will be evaluated based on alignment with our values, impact on the community, financial transparency, and organisational effectiveness.
- **Due Diligence:** Before making any contributions, we will conduct due diligence to verify the legitimacy and effectiveness of the recipient organisation.
- **Approval Process:** The board will put forward proposals for the company to vote on, ensuring compliance with this policy and budgetary constraints.
- **Record Keeping:** Detailed records of all charitable contributions, including the recipient organisation, purpose of the contribution, and amount, will be maintained for transparency and reporting purposes.

Unfortunately, we cannot support every organisation.

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## 6. Fraud Prevention

We are committed to preventing fraud and ensuring that our charitable contributions are used for their intended purposes. To mitigate the risk of fraud, we will:

- Conduct thorough due diligence on recipient organisations, including verification of their legal status, financial transparency, and track record of impact.
- Monitor the use of contributions through regular communication and reporting from recipient organisations.
- Encourage employees to report any suspicions of fraud or misuse of charitable funds through our established reporting channels.

## 7. Ethics and Values

While we recognise the importance of many worthy causes, funding decisions will take into consideration the extent to which a charity's objectives, activities, and demonstrated impact align with our values, ethical standards, and Anti-Bribery and Corruption Policy.

## 8. Compliance

This policy complies with all relevant laws and regulations governing charitable giving. Any exceptions or deviations from this policy must be approved by the board of directors.

## 9. Review and Amendment

This policy will be reviewed periodically to ensure its effectiveness and relevance.

## 10. Conclusion

At Clemark Group, we recognise the importance of corporate philanthropy in creating positive change and contributing to the betterment of society. Through adherence to this policy, we remain committed to making a meaningful difference in the communities we serve while upholding the highest standards of integrity and accountability.

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