

GIFT-GIVING AND HOSPITALITY POLICY

Business gifts, entertainment and hospitality are widely used in business as a way to express appreciation and consolidate business relationship between partners. Invitations to visit entertainment events timed with particular formal occasions, favours and small gifts could be considered appropriate subject to meeting certain requirements¹.

1. Gifts

Receiving gifts from business partners is a common practice in business relationship area. However, it is very important to ensure that such gifts do not affect objectivity of decisions taken by individuals.

Employees of the Group **are allowed to take gifts** from business partners on the condition that such gifts:

- Have assessed value not exceeding £150;
- Are branded promotional products of the business partner;
- Meet the following criteria:
 - Relevance i.e. suitable to the situation;
 - Adequacy i.e. type and value of the gift should be adequate to the position held by the receiving individual, his/her financial and social status;
- Do not imply any reciprocal commercial advantage;
- Do not contradict the Law and cultural habits of the country where the gift is made.

Gifts falling outside of the principles of this Policy but, which if rejected (in the opinion of the Group employee) would be otherwise understood as offensive or even insulting for the presenting business partner could after all be accepted. However, in such cases, the Group employee receiving such gifts should deliver the gift to the Legal Department to be subsequently publicly auctioned for charity purposes.

Group employees **shall not accept** from business partners:

- Cash or equivalent (for example, Gift Certificates (Vouchers) or Gift Cards);
- Gifts in the form of services and/or other non-monetary benefits for example such as promise to employ.

Group employees **can make gifts** on behalf of the Company on the condition that such gifts:

- Have a value:
 - not exceeding £150 (preference should be given to the gifts included in the Promotional Product Catalogue, which can be found on the Group Intranet site); or
 - exceeding £150, but which are approved by Compliance Director of the Group and Executive President of the relevant Company of the Group (Managing / General Director);
- Do not contradict the Law and cultural habits of the country where the gift is made; and
- Do not imply any reciprocal commercial advantage.

Employees **shall not make the following gifts** on behalf of the Company:

- Cash or equivalent (for example, Gift Certificates (Vouchers) or Gift Cards);
- Gifts in the form of services and/or other non-monetary benefits for example such as promise to employ.

¹ If you have any doubt whether the taking or making of a gift is appropriate or the participation in or invitation to any event, the employees should refer to Legal Department for confirmation or clarification.

2. Events

In business relationships participation in formal events arranged by business partners plays a significant role in strengthening mutual collaboration.

Group employees **are allowed to take invitations** from business partners **to visit events** where:

- Events are formal by status;
- It is an exhibition, conference or a business meeting;
- Purpose of the event is directly linked with business;
- Events meet local Law and cultural habits/traditions of the country of such event.

Participation in entertainment events (leisure travel) organised by business partners must be approved by the Compliance Director and Executive President of the relevant Business Unit of the Group (General / Managing Director).

Group employees are allowed to take / make invitations to visit partner's **events** aimed at maintaining and consolidating business relationships where such invitations meet criteria of appropriateness and adequacy and approved by higher executive personnel. Employees should understand that "events organized by business partner" assumes presence of the Inviting Party. Invitations to events without the presence of the Inviting Party shall be regarded as gifts.

3. Government Employees

Government Employees mean individuals acting as formal representatives on behalf of and under instruction from Government Agencies, National or Local Authorities of any level, International Entities, Political Parties or Candidates to any political position. By virtue of the fact that many national laws prohibit gifts to Government officers with the purpose of obtaining benefits every Group employee should be confident in that gifts made to such individuals would not be regarded as bribe.

Acceptable for Government Employees would be a gift containing Company logo with maximum value about thirty pounds (£30) or equivalent in any foreign currency unless any other limit exists for this purpose in accordance with current law.

Events or travels organized for Government Employees would be acceptable where these contain no indication of bribe and cannot be regarded as such and approved by the Regulatory and Compliance Counsel and the Managing Director of the Company.

Managing Director

T.V. Arslanova