

## GIFTS POLICY

The Gifts Policy sets out basic requirements, principles, and recommendations for offering, giving, and accepting gifts and various acts of hospitality in business relations. This policy does not apply to official activities organized by the company, its business partners, or potential business partners in the areas of charitable contributions, advertising partnerships and events focused on brand promotion, public relations, regional support, and the resulting benefits.

### Financial limits for accepting gifts

- A gift of value lesser than 100 EUR is considered small value gift. Similarly, a social event of value lesser than 120 EUR is considered small value event. These do not need to be notified nor registered.
- Both gift of value between 101 and 180 EUR (medium value gift) and social event of value between 121 and 200 EUR (medium value event) require notification to manager and gift registration.
- Gift of value higher than 180 EUR (great value gift) and social event of value greater than 200 EUR (great value event) require approval by manager and gift registration.

### Key Takeaways

- The Heads of Departments are responsible for maintaining a departmental record of gifts accepted or given by subordinate employee subject to the notification, approval and return policy.
- Employees shall refuse all unacceptable or inappropriate gifts, and if such gift has been received, they shall return it.
- Employees shall determine the value of the gift accepted or given and ensure that it is reported, approved, and recorded where required.
- Do not offer, promise, give or accept financial or other unacceptable gifts, and do not offer, promise, give or accept a gift if it would appear inappropriate in the circumstances.
- Give and receive gifts transparently, report received gifts, and ensure approval of gifts where required.