



## POLICY ON GIFTS AND INVITATIONS

EPC Groupe has adopted the Middenext anticorruption code. This policy document supplements the Middenext code in the area of gifts and hospitality received or given in the framework of business activities. It contains concrete information to allow employees to make the decisions appropriate to the context.

Depending on each situation and "codes of courtesy", each employee must take the best decision, based on the employee's experience and common sense.

**In the event of doubt, one should not hesitate to consult with his or her superiors.**

This policy document applies to all employees of the Groupe and its subsidiaries, and to all persons acting on behalf of or in the name of EPC (e.g., consultants and intermediaries).

### **Rules on gifts and invitations received and given**

Gifts and invitations could border on, or be perceived as, a means of influencing or creating an obligation in return ("active corruption" or "passive corruption"). That's why anything received or given must be in accordance with certain rules, so that an EPC Groupe employee must not be obligated to a giver, and, similarly, so that gifts and invitations from a Groupe employee cannot be considered a means of influencing the behaviour of a third party.

One key principle is that gifts and invitations must be reasonable: to assess "reasonableness", one must ask if anything is expected in return.

The following are prohibited: gifts (whether received or given) and invitations of a disproportionate value that may be such as to influence a decision, or favour a company or a person; as well as any cash gifts on the occasion of ceremonies and/or celebrations.

If it would appear difficult to offer a gift or an invitation of equivalent value, then the item in question is not reasonable.

### **They must meet a number of conditions**

- ✦ They must comply with all laws and regulations in force,
- ✦ They must lead to no obligation, or undue advantage,
- ✦ They must not lead to a conflict of interest,
- ✦ They must be reasonable, of limited value, correspond to ordinary practices, and comply with local and national laws and customs,
- ✦ They must be strictly professional,
- ✦ They must remain "occasional",
- ✦ They must not be in the form of gifts of money or anything equivalent (e.g., gift certificates or purchase vouchers),
- ✦ They must be given or received in a fully open and transparent manner.



**In terms of invitations, it is possible to accept and to offer:**

- ✦ business meals;
- ✦ invitations to an event, provided that it be in a business framework, and limited to a single event;
- ✦ hospitality should be provided only to the business contact, and no one else

In a situation affected by business transactions (invitation to tender, signing of contracts) any gift received or given must be carefully reviewed, in order to avoid the risk of corruption, particularly if public officials or public agents are involved.

**If an employee receives gifts or invitations, he/she should ask him/herself:**

- Are the gifts or entertainment justified?
- Is the value of the gift or entertainment reasonable?
- Is the frequency of the gift or entertainment reasonable?
- Could the receiver of the gift or entertainment influence the entering into of future contracts?
- Is there an intention behind the gifts?