



Ethic

Give and/or receive gifts/invitations



What is allowed

- Current uses of business life,
- Establishment and maintenance of good business relations.



Attention points

- Means to influence a decision, to favor a person and therefore,
- Likely to generate conflicts between personal interests and professional obligations.

*I have received or will receive a gift or invitation and/or have given or will give a gift or invitation.
What should I do?*

Step 1

Verify compliance with general principles

General principles for gifts and invitations :

- They must be legal,
- Offered openly and transparently,
- Reasonable and relevant to the event or circumstances,
- Offered without intent of corruption

Step 2

Check compliance with the value thresholds validated by the Group

Value thresholds:

- **Maximum 50€ incl.tax** per service provider per year (fiscal year),
- If above and exceptionally, written authorization from the Manager transmitted to the Compliance relay.





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Formal prohibition

- **Gifts and invitations given or received:**
 - For the purpose of obtaining an undue advantage or influencing a decision, or,
 - By a public official of any value, or,
 - The nature of which corresponds to: Paiements en espèces ou équivalent (virement bancaire, chèque bancaire...),
 - Sexual, immoral or illegal nature,
 - Non-compliant with applicable laws and regulations,
 - In the form of services or other benefits in kind. Example: promise to hire,
 - Outside the professional framework.
 - Whose value is more than 50€ incl.tax per year (fiscal year) and per provider
 - At a strategic moment in the relationship: tenders, commercial negotiation, signing of agreements...
- **Concealment of gifts or invitations to his employer.** Ex: reception/sending to home,
- **Soliciting gifts and invitations from partners.**



Examples of questions to ask yourself before accepting or sending a gift:

- What is the approximate value of the property? Is it < 50€ incl.tax?
- Is the gift or invitation likely to affect the performance of my duties or damage the reputation of the Euralis Group?
- When are they offered?
- Would I be embarrassed if my professional entourage learned that I received/ sent?
- Are laws and regulations respected?
- Does this comply with the internal procedures and the general interest of the Euralis Group?
- Are gifts and invitations given or received as a courtesy or as a commercial gift and not for consideration?
- Am I comfortable discussing this gift or invitation with my colleagues?

