

Appendix G: Gifts, hospitality and entertainment

We should not influence stakeholders (e.g. suppliers and clients) and do not allow ourselves to be influenced in a manner that can be construed as creating a conflict of interests or an obligation to offer a quid pro quo, bribery or reprehensible behaviour. This does not mean that we can never receive a gift from stakeholders or offer them a gift. However, the gift must be small and justifiable, and we are aware that only those things are small and justifiable that we and the stakeholder can mention without shame or hesitation to colleagues and the outside world. In any case we shall never solicit gifts or favours for business ends, and any gift, whether offered or accepted and however small, shall never take the form of money.

Principles for gifts, hospitality and entertainment

- You may not accept shortages for private services or goods.
- Before you accept an invitation or gift (including dinners), convince yourself that by accepting this gift or Invitation you will not be placed in a situation where you will not be able to perform your work independently in reference to the provider of the gift / invitation.
- You will assess if visiting an event or congress, or making a business trip will contribute to your work and is in the interest of Neways.
- You may only accept an invitation in consultation with your direct manager.
- Costs for a business trip or company visit must always be agreed on by your direct manager.
- No gifts, hospitality and entertainment may exceed the nominal or perceived value of 150 EUR per person without the explicit approval of your direct manager. If you receive or would like to offer a gift exceeding the value of €150, your direct manager must approve that the gift is justifiable in writing. In cases you are not able to discuss it with your direct manager you should discuss it with your HR manager.