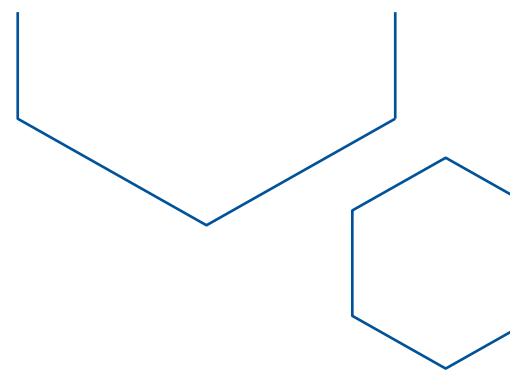




GROUP POLICY

Group Anti-Bribery and Corruption Policy
Draslovka a.s.

Draslovka



Document Information

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Confidentiality Statement

This Policy shall not be disclosed or distributed outside Draslovka Group, unless for audit or other purposes required by law or regulation or upon written approval of the Group CEO or Group Head of Compliance.

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1 Purpose and Scope

1.1 Purpose

Commitment to ethical business behavior forms the basis of the Draslovka Code of Conduct. The purpose of this Policy is to affirm the position of Draslovka Group to prevent corruption and bribery in its operations, define roles and responsibilities of Group Companies and Employees and ensure a consistent approach to business practices throughout worldwide operations. This Policy also provides guidance for Employees how to recognize and deal with bribery and corruption issues.

Draslovka Group takes a zero-tolerance approach to bribery and corruption. All Employees must at all times act in accordance with this Policy and Applicable Anti-Corruption Laws and seek to avoid even the appearance of bribery and corruption, as involvement in bribery and corruption can expose Draslovka Group and/or Employees to civil and criminal penalties and reputational damage. Employee that violates the requirements of this Policy will be subject to disciplinary actions which may lead up to termination. In some countries it might be mandatory for a Group Company to make a report of suspected bribery or corruption to the relevant law enforcement authority.

Zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, business partners and other Third Parties at the beginning of the business relationship and as appropriate thereafter.

1.2 Scope

This Policy is mandatory and applies to all Employees and all entities within Draslovka Group insofar as it does not contradict local legislation.

The implementation of this Policy in Draslovka Group shall be proportionate taking into account size and internal organization of a Group Company and the nature, scale and complexity of its activities and must reflect requirements of Applicable Anti-Corruption Laws.

1.3 Related Documents

This Policy represents an integral part of Draslovka Group compliance framework mainly laid down by Draslovka Code of Conduct.

2 Roles and Responsibilities

This clause defines roles and responsibilities related to matters covered by this Policy.

Group level

2.1 Draslovka Board of Directors

Draslovka Board of Directors, in particular:

- a) approves this Policy and ensures its regular review, at least annually, and
- b) oversees implementation of this Policy.

2.2 Group CEO

Group CEO, in particular:

- a) promotes anti-bribery and anti-corruption culture within Draslovka Group, and

- b) approves requests for charitable donations and sponsorship of value exceeding USD 10,000 (clause 6.1) and contributions to or from Public Officials (clause 4.2.1 and 6.2).

2.3 Group Head of Compliance

Group Head of Compliance, in particular:

- a) is responsible for implementation of this Policy,
- b) provides guidance to Employees in relation to any concern, suspicion or uncertainty whether a particular act constitutes or might constitute bribery or corruption,
- c) monitors, oversees and controls the implementation of this Policy in Group Companies and regularly considers its suitability, adequacy, and effectiveness,
- d) approves contributions to or from Public Officials (clause 4.2.1 and 6.2), and
- e) approves Group Guidelines and Group Instructions implementing this Policy.

Group Company

2.4 Group Company Approving Body

Group Company Approving Body, in particular:

- a) approves local implementation of this Policy and ensures regular review of its implementation, at least annually, and
- b) has overall responsibility for ensuring that local implementation of this Policy complies with Group Company's legal obligations.

2.5 Group Company CEO

Group Company CEO, in particular:

- a) promotes anti-bribery and anti-corruption culture within a Group Company, and
- b) approves requests for charitable donations and sponsorship of value up to and including USD 10,000 (clause 6.1).

2.6 Group Company Compliance Manager

Group Company Compliance Manager, in particular:

- a) is responsible for local implementation of this Policy in a Group Company and for ensuring that local implementation complies with laws and regulations applicable to a Group Company,
- b) reports implementation status of this Policy to Group Compliance Department, and
- c) provides guidance to Employees in relation to any concern, suspicion or uncertainty whether a particular act constitutes or might constitute bribery or corruption.

In case any of the above function does not exist in a Group Company, Group Company CEO shall be responsible for ensuring that the requirements set out by this Policy are properly implemented in a Group Company.

3 Anti-Bribery and Anti-Corruption Statement

3.1 What is Bribery

A bribe is an offer, request, promise, authorization to pay, or payment or receipt of **anything of value** to or from or any person or entity, which is intended to induce the recipient to misuse his or her position or to obtain an improper **business advantage**.

Anything of value includes, without limitation, cash and **cash equivalents**, gifts, entertainments, meals, travel, accommodations, valuable favors (such as educational and employment opportunities for friends and relatives), loans, or even benefits like information, advice or assistance in arranging a business transaction. It does not necessarily have to be of a big value, even a small gift is a “thing of value.”

Business advantage is a broad term and includes obtaining or retaining commercial, contractual, regulatory, personal or business advantage, obtaining preferential treatment or securing political or business concessions, including favorable tax or customs treatment, receiving permits or regulatory approvals, or bypassing laws or regulations.

Cash equivalents require compliance with the same procedures set forth for cash and include, for example, stocks, bonds, and other securities, precious metals, jewelry, coins, gift certificates, cards or vouchers, event tickets (e.g. sporting events, concerts etc.) or anything that can be easily converted to cash.

3.2 Prohibition of Bribery and Corruption

Employees must not engage (request, accept or otherwise) in any type of bribery and corruption and in any activity that might lead to a breach of this Policy.

3.3 Compliance with this Policy and Applicable Laws

Employees must at all times comply with all provisions of this Policy, as well as with all Applicable Anti-Corruption Laws. Applicable Anti-Corruption Laws might impose significant restrictions on the provision of gifts, entertainment, meals and travel, mainly for Public Officials, as well as regulate communications with such officials and impose restrictions on political contributions. Each Employee is required to avoid any activity that might lead to, or suggest, a breach of this Policy or Applicable Anti-Corruption Laws.

Each Employee is responsible for knowing and understanding this Policy, the Draslovka Code of Conduct and other relevant policies and procedures. Group Company might require specified Employees to complete anti-corruption training and/or certification.

3.4 Gifts and Entertainment

Employees are not permitted to give or receive gifts, including cash and cash equivalents, except as provided in clause 4.

3.5 Facilitating Payments and Kickbacks

Facilitating Payments and Kickbacks are prohibited, as set forth in clause 5.

3.6 Improper Payments

No Employee shall directly, or indirectly, give, offer, promise, authorize or pay anything of value to any Public Official or any other person or entity including those in the private or commercial sector to induce the recipient to misuse his or her position or to obtain an improper business advantage. Similarly, no Employee shall directly, or indirectly, request, agree to receive or accept anything of value to obtain an improper business advantage.

Employees should take extra care when interacting with Public Officials and their family members to avoid even an appearance of impropriety.

3.7 Extortionate Demands

Group Company and its Employees must reject any direct or indirect request for a bribe (including Facilitating Payments and Kickbacks), even if by rejecting such a request a Group Company is consequently threatened with adverse actions.

Draslovka Group, however, recognizes that in some cases an individual's safety could be at risk if they do not respond to such requests. If Employee encounters a situation involving imminent and serious risk to his/her safety or safety of other Employees or facilities if a demand for payment is not satisfied, such payment would not constitute a prohibited bribe under this Policy. Employees must exercise their best judgment in such situations and must contact Security or Compliance as soon as possible to report the incident. If necessary, Security will take appropriate actions. Compliance shall determine any additional actions to be taken and shall work with Finance to ensure that any payment is appropriately recorded in a Group Company's books and records.

Group Company shall not take disciplinary action against Employees who make a payment in such circumstances if they genuinely believe there was a serious threat or danger.

Mere economic pressure, however, does not amount to extortion or duress. Employees may not use a claim of extortion or duress to justify an otherwise improper payment. For example, a demand for payment by a Public Official for market entry or to obtain a contract does not classify as extortion or duress. Employees must refuse such demands.

4 Gifts and Entertainment

4.1 General requirements

In general, Draslovka Group does not encourage giving or receiving gifts and entertainment in the course of business relationship. As a part of personal responsibility and accountability, Employees are expected to use good judgement and ensure that if any gift or entertainment is provided or received, it meets all of the following criteria:

- a) it is reasonable, proportionate, not excessive in value and appropriate in the circumstances,
- b) has a clear business purpose,
- c) it is given or received openly, not secretly,
- d) it complies with Applicable Anti-Corruption Laws, company policies and procedures, as well as regional business customs and ethical standards,
- e) its giving or receipt does not give rise to conflict of interests,
- f) it cannot be construed or perceived as a bribe or improper payment, or in any other way improperly influencing a bid process, negotiation or other business interaction or relationship or any official decision, and
- g) if it becomes public, disclosure of such gift or entertainment would not embarrass Draslovka Group, Group Company or Employees.

Group Companies might apply stricter rules at local levels.

4.2 Gifts

4.2.1 USD \$100 limit

When there is a clear business purpose and all other general requirements listed in clause 4.1 are met, Employees may give or receive gifts from business partners with a total market value no greater than **USD \$100** (or its equivalent in any other currencies), with the exception of cash or cash equivalents (clause 4.2.2). All gifts to or from the same business partner during a calendar year must be added together and the total amount cannot exceed USD \$100 limit, unless approved by Employee's Manager in accordance with clause 4.7.

Gifts should not be offered to, or accepted from, Public Officials or representatives, politicians or political parties, or their family members, without the prior approval of Group CEO and Group Head of Compliance.

4.2.2 No cash or cash equivalent

Employees may not give or receive gifts of cash or cash equivalents.

4.2.3 Disposition of Gifts and Cash Equivalents

In the event that Employee receives a cash equivalent or gift with a market value exceeding \$100, the best action is to return the gift. If returning the gift is not possible because, for example, of concern that it would impact a business relationship or for logistical reasons, the receipt of the gift must be approved by Employee's Manager and the gift must be used on behalf of a Group Company (i.e. displayed at a site, donated to a charity supported by Draslovka Group or used for a company event).

4.3 Meals and Entertainment

Providing or participating in business entertainment provided by a business partner, such as business meals, receptions, cultural or sports events is permitted on an occasional basis, provided that:

- a) all of the General Requirements listed in clause 4.1 are met,
- b) the venue or event is not inappropriate or disrespectful,
- c) the business partner attends as well, and
- d) the value of the meal/event does not exceed **USD \$500** per person (or its equivalent in any other currencies). The value of all meals and entertainment provided to or from the same business partner during a calendar year must be counted together and the total amount may not exceed USD \$500 limit per person, unless approved by Employee's Manager in accordance with clause 4.7.

4.4 Public Officials

Interactions (including gifts and entertainment) with Public Officials are governed by complex and country specific laws and regulations that might prohibit providing anything of value to Public Officials. Group Companies and Employees must at all times comply with Applicable Anti-Corruption Laws and take special care in such interactions.

Group Companies shall incorporate such regulations into local implementation of this Policy.

4.5 Receiving Reimbursement – Conference or Business Partner Presentations

If Employee is invited to present at a conference, the conference organizer may reimburse Group Company for Employee's travel expenses and the registration fee for attending the conference. Employee may not accept any honoraria or other personal compensation. Similarly, if a business partner invites Employee to make a presentation at the business partner location, Group Company can be reimbursed for Employee's travel expenses, but Employee cannot accept any compensation.

4.6 Appropriateness

It is understood that the practice of giving business gifts varies between countries and regions and what may be acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind should always be considered.

4.7 Exceptions

Gifts and entertainment exceeding above limits must be approved by Employee's Manager. Such gifts and entertainment must be properly justified and supported by necessary information; Group Companies might use the form attached in Annex 2 for such purpose.

5 Facilitating Payments and Kickbacks

5.1 General requirements

Facilitating Payment (or grease payment) is a relatively small payment made directly or indirectly to a Public Official to expedite or facilitate a routine, non-discretionary actions or services that the Public Official is otherwise required to perform as part of his/her ordinary duties, such as:

- obtaining an ordinary license or business permit,
- processing government papers such as visas,
- providing police protection,
- providing telephone, power or water service; or
- loading or unloading of cargo.

Kickbacks are typically payments made in return for a business favor or advantage.

Employees must avoid any activity that might lead to, or suggest, that a Facilitating Payment or Kickback will be made or accepted by a Group Company, even if such payment is not considered illegal under the local law or is otherwise common in that jurisdiction. This Policy does not prohibit payments of official fees, which are standard, published fees available to parties and paid to governmental offices or agencies (rather than directly to Public Officials) in order to obtain non-discretionary governmental actions, such as legitimate filing fees.

In case any Employee is asked to make a payment on behalf of a Group Company, Employee should always consider what is the purpose of the payment and whether the amount requested is proportionate to the goods or services provided. Employees should always ask for a receipt which details the reason for the payment.

6 Charitable and Political Contributions and Donations

6.1 Charitable Donations

Draslovka Group only makes charitable donations and sponsorship that are legal and ethical under local laws and practices and only for charitable, educational, humanitarian, non-profitable or cultural purposes.

All charitable contributions and sponsorship on behalf of a Group Company are subject to obtaining respective approval as follows:

Amount (or equivalent in other currency)	Approval to be obtained from
Up to and including USD \$10,000	Group Company CEO
More than USD \$10,000	Group CEO

All requests for charitable contributions and sponsorship and approvals shall be kept in Group Company's register and available to Group Head of Compliance upon request.

6.2 Political Contributions

Contributions to political parties, political organizations, politicians or independent candidates, or their family members, should not be provided without the prior approval of Group CEO and Group Head of Compliance. Political contributions intended to influence or obtain a business advantage are prohibited.

Personal contributions to political parties or candidates by Employees may not involve the use of Group Company funds or office space and must be made in accordance with all applicable laws and regulations.

7 Books and Records

Group Company must maintain a system of internal controls to facilitate compliance with this Policy and keep its books and records in a manner providing reasonable details that accurately and fairly reflect transactions and dispositions or transfer of assets. Group Company must ensure that, among others:

- all transactions must be executed in accordance with management's general or specific authorization.
- all payments and other entries must be prepared and maintained by a Group Company with strict accuracy, completeness, and reasonable detail and properly recorded in a Group Company's books and records.
- false, misleading or incomplete entries in a Group Company's books, records and other business documents are prohibited. No transaction should ever be entered into that requires or contemplates the making of false or fictitious records, in whole or in part.
- no accounts must be kept "off book" to facilitate or conceal improper payments.
- circumventing or evading Group Company's internal accounting controls, or any attempt to do so, is prohibited.
- all payments on behalf of a Group Company must be approved and supported with appropriate documentation.
- no payments shall be made with the intention or understanding that the payment or its part is to be used for a purpose other than described by the supporting documents.

The requirements set out in this clause shall apply to all transactions regardless of financial value or materiality.

8 Third Parties

Payments that a Group Company, or its Employees, are prohibited from offering, making, promising, requesting or receiving directly under this Policy cannot be made, promised or accepted indirectly through a Third Party.

Third Party relationships that might involve contact with Public Officials must be in writing and include appropriate provisions on compliance with Applicable Anti-Corruption Laws as well as Group Company's expectation of ethical business conduct. Group Company should not enter into relationship with a Third Party without first examining the Third Party's background, qualifications and reputation to determine that the Third Party's commitment to ethical business practices is consistent with this Policy and the Draslovka Code of Conduct. Business relationship with a Third Party that contradicts provisions of this Policy may be terminated.

9 Speaking Up and Non-Retaliation

9.1 Seeking Guidance and Speaking Up

If Employee has any query or doubt as to the appropriateness of the offer/acceptance of a gift, hospitality, or entertainment, or any question related to bribery and corruption, Employee should seek further guidance. Similarly, every Employee who suspects that violations of law or this Policy may be occurring or are about to occur or becomes aware of suspicious, risky, or evidently corrupt conduct of any person is required to report it.

Employee's immediate Manager or supervisor is usually the first and best resource, since this person is familiar with individual roles and duties. If the Manager or supervisor is not available, or if Employee is not comfortable discussing the matter with a direct supervisor, the following resources are also available:

- Management of a business unit, department or workplace of Employee
- Compliance, Legal, HR or Finance department
- Compliance confidential mailbox ethics@draslovka.com
- Draslovka Group Ethics Hotline

9.2 Non-Retaliation

No Employee will suffer negative consequences for refusing to engage in or permit a bribery offence or for raising honest concerns in a good faith, even if it may result in Draslovka Group losing business or otherwise suffering a disadvantage.

It is prohibited to threaten or retaliate against Employee who has refused to take part in bribery or corruption or who has raised concerns under this Policy. Such retaliations might include dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If Employee believes that he/she suffered threatening or retaliation, Employee should report it to Group Head of Compliance or use any of reporting channels listed in Clause 9.1, including Draslovka Group Ethics Hotline.

10 Compliance Control

10.1 Group Company Internal Control

Group Company shall conduct periodic controls or audits of its relevant units to help ensure compliance with this Policy and applicable Anti-Corruption Laws.

10.2 Group Compliance Control

Group Compliance Department may conduct control/audit focused, without limitations, on:

- a) compliance with this Policy,
- b) awareness and training management, and
- c) effectiveness of reporting system.

Employees shall fully cooperate during such controls or audits and promptly provide all requested information, documents and records. Unless required otherwise, result of each control or audit shall be recorded in a protocol signed by responsible Manager. Material findings shall be escalated to Group Company CEO or Group CEO, as appropriate.

11 Local Implementation

11.1 Local Implementation of the Policy

Group Company is required to implement this Policy into local internal documents by approval of its Approving Body. Group Company is obliged to follow the full scope application of this Policy unless exception was approved under clause 11.2.

Group Company may apply additional or stricter rules (e.g. lower limits) at local level.

11.2 Exceptions

Group Company Compliance Manager (or other responsible person, as applicable) has the right to ask Group Head of Compliance for exceptions from this Policy only if this exception is necessary to meet the local regulatory requirements. All exceptions approved under this Policy shall be documented by Group Compliance Department and must be available upon request. Form of Exceptions Evidence is set out in Annex 3.

12 Final Provisions

12.1 Assumption

This Policy applies insofar as it does not contradict local legislation. If implementation of some rules under this Policy is not permitted under local legislation, Group Company shall proceed according to clause 11.2.

12.2 Implementing Group Guidelines and/or Group Instructions

Group Guidelines and/or Group Instructions, which describe in more detail selected matters covered by this Policy, may be developed only if there is an explicit authorization (reference) stated in this Policy and approved by Group Head of Compliance. Group Guidelines and/or Group Instructions do not build part of this Policy, however they shall be consistent with it.

12.3 Definitions

The meaning of capitalized terms used in this Policy is set out in Annex 1.

12.4 Owner of the Policy

Owner of this Policy is Group Head of Compliance.

12.5 Implementation

This Policy was issued on 1 December 2022 and shall be effective from 1 March 2023 (i.e. this is the target date from which the Policy shall be locally implemented and followed in Group Companies).

12.6 Amendments

This Policy does not form part of Employee's contract of employment and may be amended at any time.

Annex 1 – Definitions

In this Policy:

“Applicable Anti-Corruption Laws” means any applicable law or regulation addressing corruption and/or bribery applicable to Employee, Group Company and/or the Group, as well as any international convention.

“Approving Body” means a body entitled to and responsible for approval and implementation of this Policy based on Group Company’s corporate processes, including but not limited to Board of Directors.

“Draslovka” means Draslovka a.s., with its registered office at Evropská 2758/11, Dejvice, 160 00 Prague 6, Czech Republic, identification number 11786728 registered in Commercial Registry maintained by Municipal court of Prague, under file B section 26599.

“Draslovka Group” or **“Group”** means Draslovka a.s. and all Group Companies; when this term is used in connection with specific position/function it refers to managers/officers/functions with specific “Group-wide” responsibility, reporting (directly or indirectly) to Group CEO.

“Group Company” means any entity controlled by Draslovka a.s. by means of direct or indirect majority participation or a control agreement respectively.

“Group Compliance Department” means organization unit managed by Group Head of Compliance; in case there is no other staff in Group Compliance Department than Group Head of Compliance, Group Compliance Department shall refer to Group Head of Compliance.

“Employee(s)” means each person working at any level of the Group or a Group Company, including, without limitations, all full-time and part-time employees, family members, members of a Group Company’s board of directors or supervisory board, officers, directors, senior managers, consultants, contractors or any other third parties acting on behalf of the Group or a Group Company.

“Manager” means a person that is entitled to define and impose on subordinate Employee(s) working tasks and binding instructions and organize, manage, and supervise their work.

“Owner” means function/department responsible for administration of this Policy or its amendment (draft, coordination, approval process, waivers and exceptions).

“Policy” means this Group Anti-Bribery and Corruption Policy.

“Public Official” is broadly defined and includes (a) any officer or employee of any government entity, department or agency, including any person who holds a legislative, administrative or judicial position, any officer or employee of any public or state-owned enterprise, any officer or employee of a public international organization (such as World Bank, International Monetary Fund, World Trade Organization or United Nations) or any person acting in an official capacity or exercising a public function for or on behalf of any government or department, agency, or public enterprise or for or on behalf of any public international organization; or (b) any political party, official, or candidate for political office. Public Official also means officers, employees, representatives or agents of any entity owned or controlled directly or indirectly by a government, including a sovereign wealth fund or any entity owned by a sovereign wealth fund. Applicable Anti-Corruption Laws must be always considered as someone who would not normally be a Public Official in one country may very well have that status in another country.

“Third Party” means any individual or entity, with which Employee comes into contact during the course of work for the Group, including but not limited to actual and potential customers, contractors, suppliers, distributors, intermediaries, business partners, agents, advisers, trade associations and similar groups, Public Officials, and their advisors.

Annex 2 – Gifts and Entertainment Approval Form

GIFTS AND ENTERTAINMENT APPROVAL FORM

Manager’s approval is required for gifts worth over **USD \$100** and entertainment worth over **USD \$500** (or its equivalent in any other currencies).

Name	
Position	
Manager	

Details of the gift or entertainment given, received or proposed

Description of item	Reason for gift or entertainment	Location and dates gifts or entertainment given or received <small>(include dates in the past and estimated future as required)</small>	Estimated value	Further actions on receipt of gift, if any

Details of provider (if this is you then please fill out your details)

Name and position in organization	Organization name and address	Contact details <small>(phone number, email address, company website)</small>	If you are the provider, what is the reason for providing the gift or entertainment?	Nature of relationship <small>(potential supplier, customer, agent)</small>	Is there an existing conflict of interest with the provider?

Details of recipient (if this is you then please fill out your details)

Name and position in organization	Organization name and address	Contact details <small>(phone number, email address, company website)</small>	Nature of relationship <small>(potential supplier, customer, agent)</small>	If you are the recipient, what is the reason for accepting the gift or entertainment?	Is the recipient a public official or a foreign public official?	Is there an existing conflict of interest with the recipient?

Information provided in this request form will be processed for the purposes set out in the Group Anti-Bribery and Corruption Policy, in accordance with applicable data protection laws, rules or regulations.

The Employee confirms that, to the best of his/her knowledge the information contained in this request is complete and accurate.

Employee	
Signature	
Name	
Position	
Date	

Manager’s Approval	
Signature	
Name	
Position	
Date of Approval	

Annex 3 – Exceptions Evidence



GP_Annex_Exceptions
Evidence.xlsx