
	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 1 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

COMPLIANCE
GIFTS AND HOSPITALITY
Procedure

REVISION 07	Review of the Matrix – Adding acceptability criteria – Gifts & Hospitality Form Update – Gifts & Hospitality Declaration Form Update – Adding Appendix D	06/03/2025	AFU	ELD	LGH
REVISION 06	New Logo	31/10/2022			
REVISION 05	Formatting of the procedure - Actualization – Modification of the 3russia » grid	16/08/2022			
REVISION 04	Formatting of the procedure	30/11/2020			
REVISION 03	Change of the name of the Procedure	19/11/2020			
REVISION 02	Replacement of the terms “Ethics Officer” by the terms “Ethics & Compliance Officer”	28/10/2020			
REVISION 01	§2.2.1 : any received gift should be given to the Ethics Officer	04/06/2019	BY	CHECKED	APPROVED
REVISION 01	Record conformity (reference, review, writer Change reference: supersedes JUR DVR 001006 Layout	DATE 04/06/2019			

	Compliance	<u>C2 : Internal Use</u> CONF-PRO-001003 Revision : 07 06/03/2025 Page : 2 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

GROUP VALUES

The GTT Group is fully committed to conduct its activities in accordance with its values, which are the framework of the Group's organization, processes and operations.

Excellence. We relentlessly pursue excellence in all of our processes in order to preserve our preeminence on the markets on which we operate and succeed to develop on other markets while satisfying our client's needs.

Safety. We operate in the LNG transport and storage technologies sector, which accounts for the extreme importance we attach to safety. We must ensure the safety of our employees, our technologies, our services and our clients.


Innovation. GTT was born from an innovation. We must pursue our drive for innovation at all levels (technologies, organization) in order to create new business opportunities.

Transparency. Reinforcing transparency in our relationships enables us to build up long-term partnerships based on trust with our direct clients, our final clients and between our colleagues.

Teamwork. GTT will only succeed through teamwork, either internally with our colleagues, or externally with our clients, our clients' clients and our suppliers.


Our values are further illustrated in our Ethics Charter, which sets guidelines for the Group, its employees and all its stakeholders in order to promote a culture of business integrity, transparency and compliance with laws. The Group has implemented a policy of zero tolerance for all matters relating to its Ethics and Compliance policies.

This procedure is part of the Group's Ethics and Compliance program.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 3 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

TABLES OF CONTENTS

TABLES OF CONTENTS	3
INTRODUCTION	4
1. THE GIFTS AND HOSPITALITY PROCEDURE PURPOSE.....	4
1.1. THE SCOPE OF THIS PROCEDURE.....	4
1.2. WHO TO CONTACT?	5
1.3. BACKGROUND	5
1.4. DEFINITIONS.....	5
2. GIFTS AND HOSPITALITY: CORRUPTION, TRAFFIC OF PEDDLING OR ACCEPTED PRACTICE?	6
2.1. WHAT IS CORRUPTION?	6
2.2. WHAT IS TRAFFIC OF PEDDLING?.....	7
3. GENERAL PRINCIPLES OF OUR GIFTS AND HOSPITALITY PROCEDURE.....	9
3.1. COMPLIANCE WITH APPLICABLE LAW AND REGULATIONS	9
3.2. APPROPRIATENESS OF GIFTS AND HOSPITALITY.....	9
3.3. ACCEPTABILITY	10
3.4. AMOUNTS.....	11
3.5. FREQUENCY	11
3.6. TIMING.....	11
3.7. BENEFICIARY'S DECISION-MAKING FUNCTION	12
3.8. PROMOTION OF GROUP ACTIVITIES.....	12
3.9. PRACTICES AND CUSTOMS	12
4. VALIDATION PROCESS	12
4.1. SCOPE OF THE VALIDATION PROCESS	12
4.2. STEPS OF THE VALIDATION PROCESS	12
4.2.1. IN CASE OF DOUBT AS TO THE LEGALITY, COMPLIANCE OR LEGITIMACY OF A PRACTICE.....	12
4.2.2. REQUEST TO THE GROUP COMPLIANCE OFFICER.....	13
4.2.3. VALIDATION BY THE MANAGER THROUGH THE EXPENSE CLAIM APPROVAL PROCESS	13
5. GIFTS AND HOSPITALITY REGISTER	13
6. CONSEQUENCES OF BREACHING THIS PROCEDURE	13
7. FREQUENTLY ASKED QUESTIONS	13
7.1. WHAT SHOULD I DO IF I AM OFFERED A GIFT/HOSPITALITY?	13
7.2. WHAT SHOULD I DO IF I AM NOT ALLOWED TO KEEP THE GIFT OR TAKE THE HOSPITALITY?	14
7.3. WHAT CAN BE OFFERED DURING A BID PROCESS?	14
APPENDIX A – GIFTS & HOSPITALITY MATRIX	15
APPENDIX B – GIFTS & HOSPITALITY FORM.....	16
APPENDIX C – GIFTS & HOSPITALITY DECLARATION FORM	17
APPENDIX D – TIPS ON HOW TO ASSESS WHAT IS “ACCEPTABLE AND PROPORTIONATE”	18

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 4 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

Introduction

The GTT Group (the “Group”) is committed to conducting its business with honesty and integrity in compliance with the laws of all the countries in which the Group is active.

The Group does not tolerate bribery. Giving and receiving gifts or hospitality is a risk-sensitive activity that requires careful management in order to avoid bribery risks and/damage to the Group’s reputation.

1. The Gifts and Hospitality Procedure Purpose

Gifts and hospitality are an integral part of the relationships that the Group maintains with its current and potential partners.

Gifts and hospitality especially serve to:

- improve the Group’s image;
- present the Group’s products and services; and
- establish and maintain direct relationships of trust and cordiality with the Group’s partners – clients, suppliers and prospects, among others – that are an integral part of the business world.

The Procedure’s purpose is, therefore, not to prohibit such practices when legitimate and proportionate, but rather to define them so that they are not be diverted for purposes of corruption or traffic of peddling. This procedure clarifies when gifts and hospitality may be offered or accepted and record-keeping requirements.

1.1. The Scope of this Procedure


This Procedure applies to all corporate officers, employees, whether permanent, temporary or external, in their relationships with all of our current and potential partners.

All of our contractual partners, consultants and intermediaries are also strongly encouraged to comply with it.

This Procedure also applies to Group subsidiaries.

The latter shall be subject to monitoring, including audits, intended to ensure that this Procedure is being implemented and respected.

This policy does not apply to private gifts or hospitality between the Group’s employees. Please refer to the Group Travel and Expense claims procedure for gifts or hospitality provided to the Group’s employees, which are partially or fully funded by the Group.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 5 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

1.2. Who to contact?

For any questions relating to this Procedure, please contact the Group Compliance Officer:

- by email at ethics@gtt.fr

1.3. Background

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product launches. However, under certain circumstances, business courtesies or advantages, such as gifts, hospitality or expenses, exchanged with public officials or other private businesses, could be considered as corruption.


The Group forbids any type of corruption in its national or international commercial transactions with customers in the public or private sector, active or passive, direct or indirect.

The acceptance or offering of gifts and hospitality may create conflicts of interest and can expose the Group or its employees to accusations of unfairness, partiality or deceit. Business relationships may be subject to bias and the Group's reputation may be impacted. Any gift or the granting of any form of hospitality cannot be made with the purpose of obtaining, in breach of the recipient's duties, an advantage of any kind or to influence the outcome of a business decision.

1.4. Definitions

Within the meaning of this Procedure:

- **Advantages** are all Gifts and Hospitality.
- **Gifts** are all gratuities, items of value and other advantages of whatever nature, offered or promised, given or received, by our employees and agents within the framework of their business relationships.
- **Hospitality** includes all forms of trips, travel, lunch and dinner invitations, or invitations to cultural or sporting events, given or received by our employees and agents within the framework of their business relationships.
- **Public official** means any individual regardless of rank or title who is employed or appointed by or otherwise represents a public authority (political or nonpolitical) which is understood to be a national, state or local government office or agency, embassy, defense/military unit, state-owned enterprise, along with any governmental (e.g. EU, UN, NATO, OECD) or quasi-governmental (e.g. WTO, IMF) organization. For the avoidance of doubt, this includes anyone who holds a judicial position of any kind, members of a royal family, any elected representative of any kind, employees of local authorities and government departments, employees of companies wholly owned by or controlled by a public body or otherwise any person holding public authority or who discharges a public service mission.
- **Group** means GTT S.A and the entities it controls.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 6 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

2. Gifts and Hospitality: corruption, traffic of peddling or accepted practice?

It is generally accepted that the acceptance, offer or promise of Gifts or Hospitality falls under the category of the normal business relationships maintained by a group or company with its current or potential clients .

Such practices should nevertheless be defined to ensure that they do not describe, or serve to conceal, offenses constituting corruption and/or traffic of peddling.


2.1. What is Corruption?

No Group employee is permitted to engage in any act of corruption, regardless of its form or reason.

Corruption refers to:

- giving, offering, proffering, authorizing or promising, directly or indirectly, **an advantage of any kind, including a Gift or Hospitality**, to a public official or private sector personnel with the intent of improperly influencing a decision or encouraging an individual to abuse the office, duty or mandate granted by his/her functions with a view to obtaining or keeping a market, contract or any other undue advantage;
- soliciting or accepting, directly or indirectly, **an advantage of any kind, including a Gift or Hospitality**, public officials or private sector personnel, offered with the intent, or apparent intent, of improperly influencing a decision or encouraging the abuse of the office, duty or mandate granted by his/her functions.

The elements constituting corruption may vary from one system to another. In any event, the Group respects the relevant laws applicable in the countries in which it operates.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 7 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

➤ **Corruption : legal definition**

While the legal framework applicable to corruption may vary from one country to another, in many jurisdictions, the law distinguishes between two forms of corruption: “active” corruption and “passive” corruption.

Active corruption is, for a person, **the promise of a gift, remuneration or advantage** to a public official or private sector personnel for him/her to carry out or abstain from carrying out an act of his/her function, duty or mandate or facilitated by his/her office, duty or mandate granted by this function.

Also constituting a corruption offense is handing over to a public or private official who solicits, without right, offers, promises, gifts, donations or any other advantages for him/herself or another.

Passive corruption is, for a public or private person, **the acceptance of a gift, remuneration or advantage** to carry out or abstain from carrying out an act of his/her office, duty, mandate, or the abuse of his/her office, duty or mandate granted by this function.


The offense of corruption usually concerns **Public Officials**. In many countries, corruption is punishable by imprisonment and/or fine of very significant amounts.

2.2. What is traffic of peddling?

Like corruption, traffic of peddling, in all its forms, is strictly prohibited within the Group.

Traffic of peddling implies the intervention of a private or public-sector intermediary, rewarded with any Advantage, to abuse his/her actual or assumed influence with a third-party public authority or administration, to obtain a market or favorable decision.

The elements constituting the offense of bribery may vary from one legal system to another. In most countries, other than France, traffic of peddling is not an offense separate from that of corruption. In any event, the Group complies with the relevant laws applicable in the countries in which it operates.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 8 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

➤ **Traffic of peddling: legal definition**

Under the laws of many jurisdictions, there is a distinction between active and passive traffic of peddling.


Active traffic of peddling is the promising, by a person, of offers, promises, gifts, donations presents or any other advantages to a public or private-sector official, for him/herself or another, for the abuse of his/her real or supposed influence with a view to obtaining from a public authority or administration awards, employment, markets or any other favorable decision.

Also constituting an offense of active traffic of peddling is the act of handing over to a public or private-sector official, soliciting without right, offers, promises, gifts, donations presents or any other advantages whatsoever, for him/herself or for another.

Passive traffic of peddling peddling is the act, for a public or private-sector official, of accepting remuneration for abuse of his/her real or supposed influence with a view to obtaining from the public authority or administration awards, employment, markets or any other favor decision.

Traffic of peddling usually concerns (i) **Public Officials** or (ii) **private** persons.

In many countries, traffic of peddling is punishable by imprisonment and/or fine of very significant amounts.

	Compliance	<u>C2 : Internal Use</u> CONF-PRO-001003 Revision : 07 06/03/2025 Page : 9 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

3. General principles of our Gifts and Hospitality procedure

No gift or the granting of any form of hospitality shall be made in order to obtain, in breach of the recipient's duties, an **advantage** of any kind or to influence the outcome of a business decision. The same applies when receiving a gift or benefiting from a hospitality.

The receipt, offer and acceptance of Gifts or Hospitality is only authorized as set forth in this Procedure.

In case of doubt, you should either (i) refuse the gift or hospitality or (ii) refer to your management or (iii) refer to the Group Compliance Officer.

3.1. Compliance with Applicable Law and Regulations

Before proposing or accepting a Gift or Hospitality, you shall ensure that the practice complies with:

- the Group's internal rules, including the *Ethics Charter* of the Group and this *Gifts and Hospitality Procedure*;
- the specific compliance policy of the recipient or beneficiary of the Gift or Hospitality;
- the applicable laws of the country in which you work.

For example, if this procedure restricts gifts in excess of a specific value and local laws restrict gifts to a lower value, then the lower value is the one that must be complied with.

In the case of a question on applicable law, you shall consult your management or the Group Compliance Officer.


3.2. Appropriateness of Gifts and Hospitality

As a second step, after verifying that the offer or receipt of the Gift or Hospitality is not prohibited under applicable laws, it shall be determined whether this Advantage is appropriate – in other words, whether there is a connection with a legitimate interest pursued by the Group.

For this purpose, the following criteria shall be considered, among others:

- the acceptability of the Advantage;
- the amount of the Advantage;
- the frequency of the Advantages and their cumulative value;
- the time of the acceptance or receipt of the Advantage;
- the decision-making function of the beneficiary of the Advantage;
- the connection between the Advantage and the Group's activities;
- the practices and customs of their counterparts.

In any event, the Group formally prohibits its employees from soliciting, regardless of the method, the receipt of any Gift or Hospitality whatsoever, even of a negligible value.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 10 / 18
	GIFTS AND HOSPITALITY	
	Procedure	


3.3. Acceptability

- Certain gifts and/or hospitality should never be given or accepted. These include:
 - Gift and hospitality that have been requested by our clients or other third parties;
 - Cash or cash equivalents (such as gift cards or gift vouchers);
 - Anything illegal, unsavory or sexual in nature;
 - Anything that is received on the basis of a quid pro quo (i.e. on the basis that it is conditional upon receiving something in return);
 - Anything that might give rise to a perception or suspicion that the recipient has been unduly influenced;
 - Gifts or hospitality which are lavish or extravagant;
 - Gifts or hospitality offered during a tender or bid process, to or from any party involved;
 - Gifts or hospitality which are recurring, regular and/or could be part of a reciprocal arrangement;
 - Invitations to remarkable / famous and particularly expensive cultural or sporting events (e.g 2024 Olympic Games in Paris).
- Some gifts and/or hospitality may be acceptable but require special consideration, and must be authorized. These include:
 - Travel expenses of third parties involving flight and overnight stays;
 - The inclusion of partners at corporate hospitality events;
 - Invitations to particularly expensive cultural or sporting events.
- The following gifts and/or hospitality are normally acceptable:
 - Token seasonal gifts, where such gifts are a common cultural feature and at a modest value;
 - Modest, occasional meals with a business partner;
 - Small corporate, promotional gifts;
 - Occasional attendance at ordinary sporting or cultural events.

Gifts and/or hospitality may be given or received where custom dictates. However, the value (or estimated value) and kind of these should be acceptable and proportionate and must follow the authorization levels and approval processes (See 3.4).

Hospitality must have a clear business purpose, and not just be for the receivers' personal enjoyment. Invitations to events must take place in the context of a promotional campaign or public relations program organized by the Group.

As a general rule, the Group does not extend invites of hospitality to the family members/friends of client contacts. There may be exceptions to this rule from time to time that will have to be approved by the Group Compliance Officer and a clear business justification will need to be provided.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 11 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

When assessing whether a gift or hospitality request is acceptable and proportionate it can sometimes be difficult to understand what this means in practice. See **Appendix D** for some useful tips that should be considered when making these important decisions.

3.4. Amounts

Acceptance of any gift or hospitality requires careful judgement at all times. The table attached as **Appendix A – Gift & Hospitality Matrix** (hereinafter, the “Matrix”) sets out the rules in connection with gifts/hospitality that may be received from, or given to business partners.

The amounts indicated in the Matrix have been determined based on internal and external benchmarks. The Group regularly reviews the Matrix to ensure that the amounts set forth therein are in line with market practices while adequately protecting the Group and its employees. As an exception, the amounts specified in the Matrix do not apply to members of the Executive Committee; however, their expenses must be approved through the appropriate process.

Deviating from the amounts set forth in the Matrix is permitted on an exceptional basis, subject to a mandatory prior approval by your management and by Compliance. Please submit your request using the **Appendix B - Gifts & Hospitality Form**.

The other party involved in an exchange, such as a client, may be subject to gifts and hospitality policies more restrictive than those of the Group. If you have any question in this regard or believe that you are dealing with a third party with particularly complex policies, please contact the Group Compliance Officer for interpretation and guidance.

The amount of a Gift or Hospitality received or agreed upon, when excessive, is often considered as a key indicator of criminal intent. Consequently, as soon as the value of an Advantage appears clearly excessive, our employees and agents are under an obligation to refuse it or return it. If neither is practical, the recipient should discuss it with his or her manager to identify another suitable disposition, such as donating the gift to a charity.

Group’s employees and agents may accept Gifts and Hospitality whose value appears to be less than the one in the Matrix, subject to their registration in the Gifts and Hospitality Register (except for Gifts of a negligible value. e.g. a plastic pen with the client’s logo).


All Gifts must be returned to the Group Compliance Officer.

3.5. Frequency

Value is not the only consideration. Employees must also take into account the need to avoid anything that could be seen as an undue influence even if the gift is of low value. In addition, employees need to consider the frequency and cumulative value of exchange with the same recipient.

3.6. Timing

As mentioned in section 3.3. Gifts or Hospitality offered during a tender or bid process, to or from any party involved should never be given or accepted.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 12 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

3.7. Beneficiary's Decision-making Function

Our employees and agents shall be especially vigilant when they anticipate offering an Advantage to a person exercising a decision-making function, whether public or private.

Our employees and agents shall keep in mind that the greater the beneficiary's function, duty or mandate, and the greater the opportunity for him/her to make decisions influencing our business, the more the Advantage granted him/her is likely to be perceived as a form of corruption or bribery.

3.8. Promotion of Group Activities

Group's employees and agent shall, as much as possible, favor Gifts and Hospitality directly and clearly promoting the Group's activities legitimately over gifts with a promotional value that is not as apparent.

The direct promotion of the Group's activities, within the framework of this Procedure, may especially take the following forms:

- presence of the GTT logo or mark on the Gift offered, which has a nominal value;
- visit to a Group facility for purposes of legitimate demonstration, without "side trips" or other advantages.

3.9. Practices and Customs

Group's employees and agents shall consider the practices and customs of their counterparts to assess the appropriateness of the acceptance, offer or promise of a Gift or Hospitality.

4. Validation Process

4.1. Scope of the Validation Process


In addition to the prior mandatory approval by your management, a mandatory prior approval by Compliance is required in the following two scenarios:

- in the event the beneficiary of the Advantage is a Public Official;
Some laws authorize, under certain conditions, the offering of modest value and appropriate Gifts and Hospitality to public officials. Other countries formally prohibit it or very significantly restrict it (e.g.: China, USA).
- in the event the amounts set out in the Matrix are exceeded.

4.2. Steps of the Validation Process

4.2.1. In case of doubt as to the legality, compliance or legitimacy of a practice

In case of doubt as to the compliance of an Advantage with laws, regulations or this Procedure, Group's employees and agents must contact the Group Compliance Officer for advice.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 13 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

4.2.2. Request to the Group Compliance Officer

Whenever a mandatory prior approval for offering gifts and/or hospitality is required, please submit your request using the **Appendix B - Gifts & Hospitality Form**.

The employee or agent shall state the nature, the amount, the beneficiary, the purpose, along with a brief description of the Advantage.

The Group Compliance Officer will send the approved or rejected back to the employee or agent within three (3) working days. The lack of response by the Group Compliance Officer shall not be interpreted as an implicit authorization to proceed with the offer or promise in question.

4.2.3. Validation by the Manager through the expense claim approval process

The employee or agent shall join the approved form when submitting his expense claim in relation to the offered Gift and/or Hospitality.

5. Gifts and Hospitality Register

Each offering or acceptance of an Advantage must be the subject of a clear and precise registration in a single and centralized Gifts and Hospitality Register, maintained by the Compliance Department, using the **Appendix C – Gifts & Hospitality Declaration Form**.

Forms must be completed in sufficient detail so they could be understood by an independent third party, i.e. use names not initials, full organization names, and provide a description of the actual event(s) not just the location(s). You must include details of all Group's attendees at an event, not just third parties as well as names of any partners who attend.

6. Consequences of breaching this procedure


Non-compliance with this procedure by employees may result in disciplinary sanctions up to and including summary dismissal, and by contractors or agents to termination of contract.

A breach of this procedure could also be a violation of local laws and therefore result in civil and criminal penalties for the relevant company and/or individuals concerned.

7. Frequently asked questions

7.1. What should I do if I am offered a gift/hospitality?

You should first determine whether you can accept the gift/hospitality seeking approval as needed. While waiting for approval you may wish to advise the giver that approval is required, e.g. "The Group has a strict policy on gifts and hospitality, so I'm sure you'll understand that I will need to check first before accepting your kind offer/gift."


	Compliance	<u>C2 : Internal Use</u> CONF-PRO-001003 Revision : 07 06/03/2025 Page : 14 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

7.2. What should I do if I am not allowed to keep the gift or take the hospitality?

In some cases, even though you cannot keep the gift, it may be permissible to use the gift within or by your department, (e.g. all sharing a box of chocolates, or displaying a bouquet received in reception), or possibly donating the gift to a charity (having advised the donor with a suitably worded note explaining why the gift cannot be retained). In the event that a gift or hospitality cannot be accepted, it must be declined with courtesy.

7.3. What can be offered during a bid process?

You can only offer an occasional cup of coffee/working lunch to public officials or to employees of companies or organizations where the Group anticipates joining in a commercial relationship.

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 15 / 18
	GIFTS AND HOSPITALITY	
	Procedure	


Appendix A – Gifts & Hospitality Matrix

Region - Country	Gift (per person)	Meal (per person)	Hospitality (per person)
EUROPE (All countries)	Up to 50 EUR per person	Up to 100 EUR per person	Up to 200 EUR per day and per person
JAPAN	Up to 8.000 JPY per person	Up to 16.000 JPY per person	Up to 32.000 JPY per day and per person
SOUTH KOREA	Up to 75.000 KRW per person	Up to 150.000 KRW per person	Up to 300.000 KRW per day and per person
CHINA	Up to 400 CNY per person	Up to 800 CNY per person	Up to 1.600 CNY per day and per person
SINGAPORE	Up to 70 SGD per person	Up to 175 SGD per person	Up to 280 SGD per day and per person
SOUTH EAST ASIA (All other countries)	Up to 50 USD per person	Up to 100 USD per person	Up to 200 USD per day and per person
MIDDLE EAST (Qatar & all countries)	Up to 400 AED per person	Up to 600 AED per person	Up to 800 AED per day and per person
UNITED STATES OF AMERICA	Up to 50 USD per person	Up to 150 USD per person	Up to 200 USD per day and per person

Value includes all associated costs for the gift or hospitality e.g. travel, accommodation, etc.


Meals thresholds are all included e.g. beverages, tax, tips etc.

Amounts include applicable taxes / charges.

	Compliance	<u>C2 : Internal Use</u> CONF-PRO-001003 Revision : 07 06/03/2025 Page : 16 / 18
	GIFTS AND HOSPITALITY	
	Procedure	


Appendix B – Gifts & Hospitality Form

See CONF-FOR-001007

	Compliance	<u>C2 : Internal Use</u> CONF-PRO-001003 Revision : 07 06/03/2025 Page : 17 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

Appendix C – Gifts & Hospitality Declaration Form

See CONF-FOR-001008

	Compliance	C2 : Internal Use CONF-PRO-001003 Revision : 07 06/03/2025 Page : 18 / 18
	GIFTS AND HOSPITALITY	
	Procedure	

Appendix D – Tips on how to assess what is “Acceptable and proportionate”

When authorizing persons are assessing whether a gift or hospitality request is “acceptable and proportionate” it can sometimes be difficult to understand what this means in practice. The list below provides some useful tips that should be considered when making these important decisions.

- **The value and nature of the gift/hospitality**

The per head value of the hospitality is important, as it confirms how much the recipient may have had to pay out of his/her own pocket had they booked to attend the event themselves. The higher the per head value, the higher the risk for the Group to be accused of trying to influence the decision-making processes of the client, or potential client. The higher the value per head, the more detailed the business justification should be.

- **The intended recipient**

It is important to consider who the recipient of the gift or hospitality will be, to ascertain if the value per head of hospitality can be considered as acceptable and proportionate. Consider whether the gift or hospitality would be perceived to be proportionate to the recipient’s position/job title.

- **The timing of the offer**


Consideration will need to be given to where the Group is in the business cycle with the recipient’s employer. It is inappropriate to offer gifts or hospitality to client representatives if a tender process is “live”, or about to start. The same would apply if the Group’s employees were to be offered gifts or hospitality from a supplier who is currently involved (or about to be) in a “live” supply chain tender. These situations should be avoided to prevent any conflict of interest between the giver and recipient.

- **Whose idea was it to purchase the gift or hospitality**

In some situations, you might receive a request from a client or potential client suggesting they would like to attend/receive a certain event, meal, or gift. Such requests are inappropriate. Extreme caution should be applied here as the request could be seen as trying to ask for certain benefits in return or as a reward for other business favors, such as favorable contract terms or contract awards.

- **What is the stated business justification/commercial rationale?**

As referenced in this procedure, there are often good business justifications for offering gifts or hospitality. Examples of this could include a “Business award celebration meal with client representatives”, or entertainment to “maintain good working relations part-way through a project”. However, offering to take a potential new client to a high-profile sporting event (that attracts a large value per head) because you know they have a few high value contract tenders coming up shortly would not be considered to be acceptable and proportionate.

		Révision:
	CONF-PRO-001003_Cadeaux et Marque d'hospitalité_ENG	
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