

randstad group policy

gifts & hospitality and
anti-bribery.



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Function: Global Legal

1. why this policy

Gifts and hospitality can make a positive contribution to strengthening business relationships between Randstad and our business partners. That said, the independence and objectivity of the parties must never be compromised by such contribution. Business decisions may not be influenced by gifts, hospitality or improper benefits.

Bribery and corruption are very harmful to Randstad and to society in general. As a signatory to the [United Nations Global Compact](#), Randstad strives at all times to uphold its principles, also in the area of anti-corruption. By implementing this policy, Randstad employees will strengthen Randstad's reputation, build trust, respect and credibility with all stakeholders, and support our commitment to corporate social responsibility.

This policy gives guidance to all Randstad employees, including directors and officers, as to what constitutes appropriate gifts, entertainment, hospitality, sponsoring, and charitable donations, and what constitutes an improper benefit (bribery or corruption). Of course, no policy can describe all circumstances and rules. You will therefore be expected to use your common sense and professional judgment at all times.

This policy is consistent with and supportive of Randstad's Business Principles, especially principles 1, 5, 6, 7 and 13:

1. We know and comply with international human rights principles, Randstad's internal policies and procedures, and the laws that govern our business.
5. We conduct business in a fair and ethical manner and avoid any situation that could create a conflict of interest, or the appearance of conflict, between the interests of Randstad and our private interests.
6. We do not offer, pay or accept bribes or anything of value that could create undue influence or the appearance of inappropriate behavior.
7. We do not offer or accept gifts and hospitality or anything of value that could create undue influence or the appearance of inappropriate behavior.
13. We do not make contributions to candidates for public or private office, to political parties or other political interests.

2. what we expect from you

2.1 general requirements regarding gifts and hospitality

We ask you to keep in mind that when offering or accepting gifts and hospitality, you should always consider the business rationale behind it and its appropriateness. Randstad expects you to avoid creating any possible impression of inappropriate pressure or behavior. This means that all gifts and hospitality (both offered and received) should adhere to the following six conditions (*m.i.m.i.t.a.*):

modest	not excessive or of such value that it may seem to put undue pressure on the recipient, influence a business decision or even create the impression of a relationship of dependency
infrequent	a recurring pattern of gifts and/or hospitality (e.g. each quarter) can be regarded as an indicator of inappropriate influence
moment: offered and accepted at the right moment	not coinciding with contract negotiations or decisions by the recipient on awarding projects or decisions on commercial issues
intentions: offered and accepted with the right intentions	to build goodwill or show appreciation, unsolicited (never asked for), not as a way of persuading the recipient, to influence a business decision, or to obtain favorable treatment
transparent	open and free discussion of the gift or hospitality with both our own and the recipient's colleagues as well as any third party should not give rise to any concerns or embarrassment
appropriate¹ in the circumstances	the gift or hospitality should always be in line with applicable policies on the part of the recipient and with prevailing public opinion; it should be in line with our core values and applicable

¹ This means that gifts and hospitality may never be in the form of cash or cash equivalents (e.g., securities, gift vouchers, individual discounts, etc.). In the event of national customs (e.g., vouchers at Chinese New Year), Global Legal may be requested to provide an exemption in writing.

law; it should be mindful of Randstad's excellent reputation; and it should be proportionate to the recipient's position

2.2 gifts

Unless prior approval has been obtained, you are only allowed to accept or offer gifts whose nominal value does not exceed [€ 50]² per person, and the total value of gifts per person should not exceed [€ 100] per year for any one individual. These amounts are subject to local variation (see footnote 2) and always subject to the m.i.m.i.t.a. conditions mentioned above.

Prior approval has to be obtained from your managing director or such other function or department as nominated by your managing director. See [annex 2](#) for further details.

Gifts may not be in the form of cash or cash equivalents.

Gifts may not be sent to or received on private/home addresses.

- Q.** During a business, trip I was offered a diving mask with a value of more than € 50. I know that accepting such a present is contrary to the Randstad Business Principles, but I did not want to offend the business relation and felt obliged to accept anyway. What should I do?
- A.** Whenever possible, you should decline such a present politely, indicating that it is not in line with Randstad's Business Principles to exchange valuable gifts. In the rare case that in a specific culture a refusal would offend the business relation, you may accept it, provided you inform your manager as soon as possible, who will subsequently decide on what to do with the gift.

company to company gifts

It is usually acceptable if a company openly presents a formal gift to another company or a governmental body. However, if the nominal value of the gift is more than [€ 250] or if it is offered to a governmental body, prior screening against the laws of the recipient's country and local policies (if available) and our own policies is required, as well as written consent from your managing director (or such other function or department as nominated by your managing director). If in doubt, always consult Randstad Legal.

offered by vendors and suppliers

Gifts and hospitality offered by current and/or potential suppliers and vendors should be treated with extra caution. If your position within Randstad makes you responsible for choosing between suppliers or vendors, such gifts and hospitality should be declined, as this may harm our company's credibility and reputation (as well as your own).

- Q.** A supplier has given a really expensive coffee machine to our purchasing department; they want to demonstrate the quality of their machines and coffee as well as celebrate our business relationship. Can we accept the machine?
- A.** Even though it may be tempting - and the machine can be used by the department -, it is not appropriate to accept the machine. You and your purchasing colleagues could be inappropriately influenced by this gift and it creates the wrong impression with other departments and (potential) suppliers. In addition, you do not want to run into servicing issues with/dependencies on the supplier in relation to the machine. You should politely refuse the gift and send it back to the supplier.

² These amounts, as well as the other amounts mentioned, are for guidance purposes only and each Randstad Group company managing director has to set local limits, taking into account local laws and regulations and local business practice. The local amounts are to be communicated in the local Randstad guidelines for gifts and hospitality. See [annex 2](#) for further details.

2.3 hospitality (including business events, meals, sports and similar events)

It is acceptable to offer or accept occasional invitations for business events, technical conferences, sports events and other types of hospitality, as well as occasional invitations for meals. However, when you are involved in contract negotiations (e.g., renewals, RFPs, etc.), you may have to decline or refrain from offering such hospitality. When inviting clients, also check the contract for any restrictions on gifts and hospitality. Contact Randstad Legal in the event of any doubt.

The six conditions (*m.i.m.i.t.a.*) described in paragraph 2.1 above also apply to hospitality.

Q. Randstad is organizing a hospitality event on the Clipper for its clients; an afternoon session with business content followed by drinks and dinner. The total value per individual is around € 100. The top 50 clients are invited, max. 2 persons per client. One of these clients has just issued an RFP for contract renewal. Can I still invite this client?

A. In this case, you may first want to check the client contract as well as any RFP requirements to assess if hospitality is mentioned. If there are no restrictions, you can invite your contacts for this event, as it is a general hospitality event (reasonable and proportionate) for a larger group of clients. Inviting just these two people for an exclusive Clipper visit would, of course, be different. In that case, the invitation would certainly create the appearance of undue influence.

maximum amounts

Unless prior approval has been obtained from your managing director (or such other function or department as nominated by your managing director), you are only allowed to accept or offer hospitality whose nominal value does not exceed [€ 250]³ per person (or a different amount if local laws or the local Randstad guidelines for gifts and hospitality so stipulate). See annex 2 for further details. For any hospitality exceeding € 1,000 per person (or its equivalent in local currency), Global Legal should be consulted first.

Q. Can I still invite business contacts for lunch or dinner?

A. Yes, you can. Please bear in mind that the six conditions indicated in paragraph 2.1 of this policy apply; modest, infrequent, moment, intention, transparent, appropriate in the circumstances. A lunch with a business contact for € 200 may be below the maximum amount, but in most cases not consistent with this policy.

always inform the employer

When inviting clients, you should ensure that the invitee's employer is aware of the hospitality offered and arrange a written record. Ideally, this would be a confirmation by the employer. When this is not feasible, make sure that the invitation includes wording to the effect that the person invited should check that their acceptance is in accordance with the client's relevant policies and procedures and inform their employer.

travel and overnight accommodation (as part of hospitality)

Any hospitality involving international or other long-distance travel and accommodation is by definition regarded as unusually generous. However, if a sound business reason exists, employees may be able to accept invitations to events abroad (provided they fall within the limits and guidelines of this policy, including any applicable local guidelines), but only if Randstad pays for travel and accommodation expenses, and subject to receiving prior written approval of your managing director (or such other function or department as nominated by your managing director) and proper registration of the event (see section 2.5).

³ This amount, as well as the other amounts mentioned, is for guidance purposes only. Each Randstad Group company managing director has to set local limits, taking into account local laws and regulations and local business practice. The local amounts are to be communicated in the local Randstad guidelines for gifts and hospitality. See annex 2 for further details.

Paying for travel and overnight accommodation for potential or existing clients or any other business contact is not allowed, unless directly related to the promotion, demonstration or explanation of our services or in connection with an occasional client hospitality event. In such an event, you need the prior approval of your managing director (or such other function or department as nominated by your managing director). Even when promoting or demonstrating services, paying for travel and accommodation will only be justified if there is no more cost-efficient alternative available. Also make sure that the invitee's employer is informed about the hospitality offered.

Q. Could you give an example of a 'cost-efficient alternative'?

A. A potential US client wants Randstad US to fly him and his assistant to the far side of the USA to see a client solution similar to what his company is considering. Randstad could drive the potential client to an identical project located only a 2-hour drive away. Although the flight ticket for the potential client is directly related to the demonstration of Randstad services, the related costs are not justified. The project located a 2-hour drive away is the cost-efficient alternative in this case.

spouses, family members or private guests

Hospitality for spouses, family members or private guests requires the prior approval of your managing director (or such other function or department as nominated by your managing director). Spouses and family members of government officials should never be invited without the prior written consent of your managing director, and only after consultation with Global Legal.

what if the host is absent?

Only offer hospitality to a business relation if you – or another Randstad representative – act as host and remain present. Only accept hospitality if your business relation acts as host at the event. Treat a ticket to an event as a gift (and not as hospitality) if you or your business relation does not act as host at the event.

Q. One of my clients is the sponsor of my favorite football team. We have talked about this several times. I just got a call from the client that he has two spare tickets for Sunday's match. He cannot make it himself, and asks if I would like to go with a friend. The tickets cost € 60 each. Of course, I would like to accept, but can I?

A. As your business relation is not present at the match, you have to treat this as a € 120 gift instead of a hospitality event. The value is above the threshold, so you will have to go through your local approval process. This means that your managing director (or other nominated person or department) has to approve, taking into account your role, the client relationship, and any other relevant circumstances. If it is approved, you will have to register this gift.

2.4 government officials

When doing business in the public sector or when liaising with government officials⁴ for business purposes, you need to be aware of the special status of government officials. In principle, government officials are not permitted to accept any gifts or anything of value, precisely to avoid corruption or the impression of corruption.

Employees and persons acting on our behalf or for our benefit may not give, offer, promise or authorize gifts or hospitality to government officials unless Randstad Legal has been contacted beforehand to ensure that such an arrangement can be assessed and approved. This also means that the travel expenses of any government officials are not to be paid or reimbursed by Randstad, regardless of whether or not such individuals are acting in an official capacity. Individual exceptions for travel expenses may be made in writing in advance by Global Legal and will be

⁴ The term 'government official' covers a wide range of positions in administrative, legislative, executive or judicial government, whether paid or unpaid, temporary or permanent, elected or appointed, senior or junior. Some examples of government officials are public servants, public officials, administrators, policemen, judges, public prosecutors, customs officials, employees in state companies, local politicians, political parties, political officials or candidates for political office, members of the royal family, mayors and city council members, as well as family members of any of the above.

subject to strict limitations. All travel reimbursements for government officials must be fairly and accurately recorded.

2.5 information, approval and registration

All gifts and any form of hospitality offered must be adequately and explicitly recorded in the financial records of the relevant Randstad Group company. When gifts or hospitality are part of a Randstad Group company's marketing program, these must also be adequately recorded by the relevant marketing department.

In cases when approval from your managing director (or such other function or department as nominated by your managing director) is required, the approval request and the approval received must be properly documented.

You should also register all gifts and any form of hospitality offered and received that exceed the limits set for your Randstad Group company. This should be done in accordance with the local procedure so as to keep a complete record (see [annex 2](#)). Such records, including any prior approvals, will be reviewed during country audits. For certain management levels, additional written reporting requirements may apply locally or may be introduced.

3. improper benefits: our anti-bribery and corruption approach

3.1 general information

Randstad does not engage in bribery or corrupt behavior nor does Randstad provide or authorize improper benefits or payments. We also avoid the appearance of bribery and corruption: any act which might seem dishonest, illegal or could create a breach of trust or otherwise create undue influence is unacceptable. The use of third parties, directly or indirectly, to avoid following this policy is also prohibited. We only offer gifts, hospitality or other items of value that avoid the impression of undue influence or the appearance of inappropriate behavior. Providing, offering or accepting anything of value in deviation of this policy is prohibited.

Facilitating payments are also prohibited. These are small payments made directly to a government official to secure or expedite routine governmental actions to which you are entitled (e.g., visa, permit or license, port clearance, telephone connection, etc.). Requests for facilitating payments are more common in certain regions than in others. Facilitating payments may seem innocent, but are a form of corruption! Randstad forbids making facilitating payments and promotes measures to eliminate such practices.

Q. Can you give an example of a bribe?

A. A bribe is anything of value (i.e., not only money) that provides a benefit to the recipient, such as cash or cash equivalents (e.g., gift vouchers), the purchase of property or services at inflated or discounted prices, extravagant hospitality, cars, jewellery, home improvements, intangible benefits, travel and shares. It may also include individual financing or discounts not generally available, such as a scholarship or an internship for a relative.

3.2 using intermediaries (e.g., agents)

The use of intermediaries (such as agents, service providers, representatives or consultants) to acquire business with clients or receive services from a government authority is an area that is at particularly high risk of involving bribes. Although such use is not common in the Randstad Group, extra care needs to be taken if such service providers are used. Be aware that they cannot be appointed without the prior written approval of Global Legal. If you already make use of a particular intermediary, you should contact Global Legal in order to obtain written approval of that arrangement.

- Q.** I want to appoint an external consultant to ensure I get the required licenses from the local authority quickly. Any delays will harm the client's and Randstad's business. The consultant who has been recommended to me is said to be quick and knows the relevant authorities very well. Can I contract this external consultant?
- A.** You will need to make sure that the external consultant is a reliable party who will follow all legal requirements to obtain the license. This requires proper screening of the consultant (reputation, references, conflict of interest, website, commitment to anti-bribery, etc.). The contract with the consultant must include very precise wording on the services that are to be provided and has to be explicit on the fees to be paid in relation to the license and the costs charged by the consultant. The Randstad Global Supplier Code must be part of the contract. If any bribes or facilitating payments are involved, this will be very harmful to Randstad (and to society in general). Always obtain prior approval from your managing director and involve Global Legal immediately.

3.3 sponsoring, charity and international travel

If compensation of international travel and accommodation costs is offered by Randstad Group companies in exceptional circumstances (e.g., in relation to international business events or specific sponsoring activities), appropriate procedures must be implemented separately to ensure that all legal requirements are met (see 2.3).

For all sponsoring and charitable donations, make sure that you follow the [Randstad Global corporate citizenship and philanthropy policy](#) and:

- check the legal limitations in your country and make sure that the charity is a bona fide charity that does not, directly or indirectly, facilitate the payment of bribes or finance crime, terrorism or political parties;
- consult Randstad Legal and obtain prior written approval from your managing director;
- give openly and directly to those who benefit, and avoid donations via third-party intermediaries, agents, service providers, representatives and the like;
- avoid conditions being attached or tangible benefits received in return, and do not give to charity as a 'reward' afterwards;
- avoid even the slightest impression of undue influence and make sure that any request for charity is not an attempt to bypass our prohibition on bribery and corruption (check family associations with the recipients, for instance);
- be cautious when a donation or 'sponsorship' is requested or hinted at in relation to a business transaction; ensure that real sponsorship is not used for the wrong purposes;
- act transparently and keep detailed records; and
- exercise professional judgment and take responsibility for your decisions.

3.4 no political contributions

Consistent with our Business Principles, employees and third parties working for Randstad may not make contributions to any candidate for public or private office or public international organizations, to political parties or to other political interests on behalf of or for the benefit of Randstad, either directly or indirectly.

4. when in doubt and/or when to report

When in doubt, talk to your manager, a (local) Human Resources representative, Randstad Legal or your local integrity officer. You can also always reach out to Global Legal or the central integrity officer. Transparency is part of the Randstad culture. It determines how we look after each other and it prevents you or one of your colleagues from getting into a difficult or even criminal situation.

In accordance with the [Randstad Group Misconduct Reporting Procedure](#)⁵, you are obliged to raise your concerns if you suspect that a Randstad employee, officer or director is violating this policy in any way. Do not hesitate to make use of the Integrity Line (Randstad's free phone and web access for reporting misconduct) if you are unsure how to address your concerns.

Each reported incident will be taken seriously by Randstad and will be investigated thoroughly. In some cases, however, activities that in the first instance appear questionable may, on closer examination, be entirely appropriate or indeed required.

A policy cannot describe all circumstances and rules. As an employee, you should use your common sense and professional judgment at all times.

5. sanctions

Non-compliance with this Policy on gifts & hospitality and anti-bribery may get Randstad and yourself in a very harmful or even criminal situation. It may result in disciplinary measures being taken.

Non-compliance with anti-bribery legislation may lead to severe fines for the companies involved. It may also lead to fines for the individuals involved, dismissal for misconduct or even imprisonment. Non-compliance will also seriously harm Randstad's reputation.

As stated above, you are obliged to report any suspicion or actual violation of this policy. If you fail to do so, you may also be subjected to disciplinary action. So please help us to build trust and support our excellent reputation.

NB If stricter requirements in relation to gifts and hospitality apply to you (e.g., rules contained in your employment contract, applicable local law or employee handbook), such stricter requirements will always prevail over those laid down in this policy.

contact details Randstad Legal and Global Legal

Where this policy refers to **Randstad Legal** it refers to the legal department of the relevant Randstad Company. Where the Randstad Company does not have a legal department, either the external legal advisor must be contacted or Global Legal directly.

Global Legal may be contacted via the legal counsel at Global Legal that is responsible for your country (via Randstad Legal) or via the senior compliance counsel, Dieuwke Visser (dieuwke.visser@randstad.com or complianceofficer@randstad.com).

⁵ See your local intranet, website or go to randstad.com

annex 1

some additional scenarios: in case of any doubt, pause and discuss

	unacceptable DON'T	to be carefully analyzed DISCUSS	normally acceptable DO
Part 1: government officials - always be cautious and check locally!			
Inviting a government official to a COMPANY sponsored business hospitality event.	If there is a risk that this may appear to influence the official or if the official is not allowed to accept your invitation based on local law or policy	All gray areas in between (e.g., ongoing discussions with this government official about a pending request, permit or decision)	Merely cementing good relations and demonstrating goodwill and it is obvious that the official is allowed and has been granted approval to accept our invitation
Inviting a government official to dinner and/or entertainment .	If there is a risk that this may appear to influence the official or if the official is not allowed to accept your invitation based on local law or policy	Always discuss, as any benefit for a government official is sensitive in the light of anti-bribery legislation	If the event is in line with our policies (routine business courtesy only) and does not breach local laws and policies that apply to the official
Inviting a government official to negotiate abroad .	If the place is chosen at the request of the official, it is likely to be regarded as a bribe.	Always discuss, as any benefit for a government official is sensitive in the light of anti-bribery legislation	Never
Making payments to the government	Cash paid to an individual government official	Anything in between	Payments made into formal bank account of a governmental department based on a proper invoice for agreed services generally available to others
Part 2: Private business contacts			
When on a business trip, offering a special gift (e.g., designer wallet of a well-known fashion house) as a token of appreciation to some employees of potential clients		Whether the gift is reasonable and appropriate (or a bribe) under the circumstances depends not only on the monetary value of the gift, but also on the nature of the business relationship and the respective roles in that relationship. Always check the recipients' rules as well as our 6 conditions (<i>m.i.m.i.t.a.</i>)	
	unacceptable DON'T	to be carefully analyzed DISCUSS	normally acceptable DO

Taking a prospective client out for a nice dinner when trying to close a deal	If the intention is to 'smooth' the deal and put pressure on the recipient (a quid pro quo). Inappropriate timing!	Anything in between	Celebration after signing a deal, but do not promise a lavish dinner beforehand and check if the client's code of conduct or policy has restrictions on gifts and hospitality
Trying to agree with an existing client about an increase of our fees and taking her out for a nice dinner	Just before the other party needs to take an important commercial decision	Anything in between	After agreeing on commercial terms - but check if the client's code of conduct or policy has restrictions on gifts and hospitality
Inviting a client who loves soccer to a match	Inviting the same person more than occasionally is improper	If the client's code of conduct or policy has restrictions on gifts and hospitality	Once or twice a year is appropriate (provided the costs are reasonable in relation to the customer's spent)

annex 2

financial limits for gifts and hospitality – central guidance

Limits to be determined by the relevant Randstad Group company managing director.

Legal advice must be obtained to ensure that such limits are permitted under local laws and regulations and appropriate for and in line with local business practice. Local amounts should be communicated to all employees as part of this policy in local guidelines for gifts and hospitality.

1. gifts (giving *and* receiving)

The following financial limits⁶ apply per gift and per client, prospect, supplier or other⁷:

- All employees [€ 50]
- Members of the local management board [€ 250]
- Company to company gifts (see 2.2) [€ 250]

These limits also apply when receiving gifts.

For gifts exceeding these limits, employees must get approval from their managing director (or such other function or department as nominated by the managing director). Members of the local management board must get approval from the relevant EB member. The approval request and the approval received must be properly documented.

2. hospitality (giving *and* receiving)

The following financial limits⁶ apply to hospitality per event and per client, prospect, supplier or other⁷:

- All employees [€ 250]
- Members of the local management board [€ 1,000]

These limits also apply when receiving/accepting hospitality.

For hospitality exceeding these limits, employees must get approval from their managing director (or such other function or department as nominated by the managing director). Members of the local management board must get approval from the relevant EB member. The approval request and the approval received must be properly documented.

For any hospitality exceeding € 1,000 (or its equivalent in local currency) per person, Global Legal should be consulted beforehand.

3. registration

All gifts and hospitality offered to or received from clients, prospects and suppliers that exceed a value of € [50] for gifts and € [250] for hospitality should be registered in accordance with local registration requirements. These consist, as a minimum, of a registration e-mail address managed by the managing director (or such other function or department as nominated by the managing director). For example, giftsandhospitality@localRandstadOpCo.xx.

This email address is managed by [local legal/CFO/other].

Registration must include the following details: name of offering and receiving party, relationship between parties, date of gift/hospitality, type of gift/hospitality, estimated value, and the name of the manager who approved the gift or hospitality, if applicable. If you are not sure about the exact value of a gift or hospitality, you should always register it, unless you are certain that the value is significantly lower than the threshold amounts.

⁶ These are indicative amounts in euros. All amounts mentioned are for guidance purposes only and each Randstad Group company managing director has to set the local limits, taking into account local laws and regulations and local business practice. The local amounts are to be communicated in these local Randstad guidelines for gifts and hospitality.

⁷ If gifts or hospitality are offered to several people at the same client, the value per client may be substantial. The relevant departments/team, together with Randstad Legal, should assess whether they are still in line with the m.i.m.i.t.a. conditions, and, where relevant, check with the managing director for approval.

GIFTS & HOSPITALITY AND ANTI-BRIBERY POLICY

general principles:

We do not offer, pay or accept bribes or facilitating payments.

We do not offer or accept gifts or hospitality, or anything of value that could create undue influence or the appearance of inappropriate behavior.

Gifts and hospitality have to be in line with the "mimita" requirements:

modest; **i**nfrequent; **m**oment: offered and accepted at the right moment; **i**ntentions: offered and accepted with the right intentions; **t**ransparent; and **a**ppropriate in the circumstances

Contact Randstad Legal if you have any doubts or questions or if you suspect or know someone is breaking the rules.

DOs

- Make sure that gifts and hospitality are reasonable in terms of cost, quantity and frequency (gifts of nominal value no issue).
- Make sure that any gifts and hospitality you offer or accept are proportionate to seniority.
- Check your local thresholds, and obtain approval and register the gift/hospitality if over the threshold.
- Check in advance whether offering of gifts or hospitality is allowed by the policy applicable to the recipient. This may be particularly sensitive with government clients.
- If you want to offer a gift or hospitality, assess in advance whether the timing is appropriate (e.g., not during a tender or contract negotiation process).
- Make sure you are transparent, if only to avoid misunderstanding. If you have doubts about the transparency of the person you are giving a gift/hospitality to (or receiving it from), do not offer (or accept) it.
- Join hospitality events organized by Randstad.
- Always seek further approval when public officials or government employees are involved.
- Keep a record of gifts and hospitality in your local register.
- Seek approval of Global Legal before making use of intermediaries or agents to get business with clients.

DON'Ts

- Do not exercise undue influence on the decision making process of clients by offering them money or other items of value.
- Do not offer a gift or hospitality that is illegal, embarrassing or inappropriate.
- Do not accept money or any other items of value that are offered with the intention of influencing our decision making.
- Do not send gifts to (or receive gifts on) private/home addresses.
- Do not make, promise or offer gifts or hospitality to public officials or government employees.
- Do not pay travel expenses to public officials of government employees.
- Do not make political contributions.
- Do not offer or accept international travel or accommodation (unless authorized).



