



AID FOR DECISION-MAKING ON GIFTS

This advice is intended to aid you in your decisions on whether it is OK to accept and/or offer gifts or invitations. It does not free you from your duty of care. Therefore, when in doubt contact your Compliance Coordinator.

IMPORTANT: THESE RESTRICTIONS ALWAYS APPLY!



- Do not accept or offer monetary benefits (securities, loans or any other monetary gift).
- Do not accept or offer benefits which are dependent on business-related decisions.
- Do not accept or offer benefits of a sexual or offensive nature.
- Do not make or accept any offers of advantages.
- Do not accept or offer high-value benefits that clearly exceed what is socially reasonable.
- If you commission a Dradura contractor to perform private work on your behalf, it is your responsibility to prove that you did not receive any financial or other benefits by doing so.
- You may not offer any benefits to officials – whatever the value of such gifts or invitations. (Officials are those who are government officials holding the position of government officers or judges, and civil servants who are employed in any other position within a public-law agency or who have been otherwise appointed to carry out public administration tasks at another entity, or on behalf of such another entity, regardless of the organizational structure chosen for the fulfilment of such tasks.)

MAY I ACCEPT AND/OR OFFER A GIFT?

When **a** business-related decision is about to be made (contracts, orders etc.).



NO
Irrespective of value, I may neither accept nor offer gifts in such cases

When **no** business-related decision is about to be made (contracts, orders etc.).



OK
if the value of the gift **is less than \$50**.

OR



OK
if the value of the gift **is greater than \$50** and one of the following conditions apply:

- **The gift is appropriate to the position of the recipient and to the occasion.**
- **Not to accept and/or offer the gift will seriously damage business relationships.**



**All exceptions require written approval from the relevant Compliance Coordinator.
All accepted or granted gifts with a value greater than \$50 are always to be reported to your supervisor!**

In case of queries, contact our Compliance Office.



DRADURA



AID FOR DECISION-MAKING ON INVITATIONS

This advice is intended to aid you in your decisions on whether it is OK to accept and/or offer gifts or invitations. It does not free you from your duty of care. Therefore, when in doubt contact your Compliance Coordinator.

IMPORTANT: THESE RESTRICTIONS ALWAYS APPLY!



- Do not accept or offer monetary benefits (securities, loans or any other monetary gift).
- Do not accept or offer benefits which are dependent on business-related decisions.
- Do not accept or offer benefits of a sexual or offensive nature.
- Do not make or accept any offers of advantages.
- Do not accept or offer high-value benefits that clearly exceed what is socially reasonable.
- If you commission a Dradura contractor to perform private work on your behalf, it is your responsibility to prove that you did not receive any financial or other benefits by doing so.
- You may not offer any benefits to officials – whatever the value of such gifts or invitations. (Officials are those who are government officials holding the position of government officers or judges, and civil servants who are employed in any other position within a public-law agency or who have been otherwise appointed to carry out public administration tasks at another entity, or on behalf of such another entity, regardless of the organizational structure chosen for the fulfilment of such tasks.)

MAY I ACCEPT AND/OR OFFER AN INVITATION?

The value of the invitation including hospitality per person is **less than \$50**.



OK
I may always accept and/or offer minor invitations.

The value of the invitation including hospitality per person is **greater than \$50**.



NO
I may not accept and/or offer invitations of a costly nature.

OR



OK
When **all** the following conditions are met:

- **When no business-related decision is about to be made (contracts, orders etc.).**
- **The commercial aspect of the event is obvious.**
- **At least one representative from every party is present.**
- **Each partner pays for his/her own travel and accommodation.**



All exceptions require written approval from the relevant Compliance Coordinator.
All accepted or granted invitations with a value greater than \$50 are always to be reported to your supervisor!

In case of queries, contact our Compliance Office.



DRADURA