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GIFTS, MEALS, AND ENTERTAINMENT POLICY

POLICY ON ACCEPTING OR PROVIDING BUSINESS GIFTS, MEALS, AND ENTERTAINMENT

1.0 PURPOSE

Stericycle, Inc. is committed to the highest standards of integrity in our business practices and to complying with the law in the conduct of its business operations worldwide, as set forth in the Code of Conduct. The purpose of this Ethics and Compliance policy is to establish guidelines for accepting or providing business gifts, meals, and entertainment.

2.0 SCOPE

This Policy applies to all team members and board members of Stericycle, Inc., and its Controlled Entities, subsidiaries and affiliates (collectively, “Stericycle”) and Stericycle Business Partners. For entities in which Stericycle does not have a controlling interest, Stericycle will use its best efforts to implement this Policy or a substantially similar Policy, and related procedures.

This Policy is NOT intended to govern gifts or entertainment provided by Stericycle to team members, or personal gifts provided by one team member to another and paid out of his/her own funds that are unrelated to their performance or role at the Company (e.g., a personal gift from one team member to another). It also does NOT govern travel, meals and related expenses incurred by team members in connection with necessary and authorized Company business. Such expenses are governed by the Travel and Expense Policy.

Stericycle team members are responsible for reading, understanding, and complying with this Policy.

Individual Stericycle entities may choose to adopt more restrictive rules or guidelines for gifts, meals, and entertainment but must, at a minimum, follow this Policy. In addition, where local law imposes stricter restrictions than required under this Policy, local law prevails and must be followed.

3.0 DEFINITIONS

Gifts, Meals, and Entertainment	Gifts, meals, and entertainment exchanged between Stericycle team members and Business Partners or other third parties to enhance legitimate business relationships and/or further our mutual business interests.
Business Partner	Includes Stericycle vendors, suppliers, Customers and Third-Party Representatives.
Controlled Entity	Any entity in which Stericycle, Inc., directly or indirectly, has a greater than 50% interest, earns over 50% of the profits (or capital or beneficial interest), or holds over 50% of the seats on the board or other governing body; or any entity in which Stericycle has any other type of controlling power, such as a golden share.



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Customer	Includes any current or prospective Stericycle customer, and anyone who is an owner, shareholder, employee, director, officer, or representative of a current or prospective Stericycle customer.
Gift	Anything of value given to the recipient, typically in the form of a tangible object, but also including services, or even discounts on products and services unavailable to the general public, either given or received, with no actual or expected compensation or adequate consideration in return.
Government Official(s)	<p>Includes anyone who is a(n): agent, representative, official, officer, director, or employee of any government or any department, agency, or instrumentality thereof (including but not limited to any officer, director, or employee of a state-owned, operated or controlled entity, i.e. hospital, NATO, University) or of a public international organization, or any person acting in an official capacity for or on behalf of any such government, department, agency, instrumentality, or public international organization. Including any candidate for political office.</p> <p>It is important to note that Government Official is broadly defined in this Policy and covers not only elected and appointed Government Officials, but also extends to employees, third parties and/or contractors of government-owned or government-controlled entities acting in a commercial capacity (e.g., accounts payable clerk at a government-owned hospital, teacher at a State University). See Appendix A for additional examples of Government Officials.</p>
High Risk Vendor (“HRV”)	Any Third-Party Representative that is state owned or that may interact with a government agency or government officials on behalf of Stericycle (i.e., consultants, logistics providers, sales or customs agents). See Appendix A for additional examples.
Hospitality Expenses	Payments for, or related to, travel, accommodations, meals, or entertainment on behalf of a Business Partner.
Third-Party Representative	Any non-employee or outside party, regardless of title, who (i) provides goods or services to the Company; (ii) represents the Company; (iii) acts with discretion on the Company’s behalf; or (iv) acts jointly with the Company. Depending on the services provided by a Third-Party Representative, the entity could be classified as a High Risk Vendor as defined above.

4.0 OWNERSHIP/RESPONSIBILITIES

The Office of Ethics & Compliance (OEC) has ownership of this Policy. Questions about the Policy can be directed to the OEC at ethicsandcompliance@stericycle.com.



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5.0 REQUIREMENTS

Exchanging gifts, meals, and entertainment is generally an appropriate way to build and strengthen business relationships. However, gifts, meals, and entertainment can present significant ethical and legal risks for both the Stericycle and individual Team Members under governmental regulations and anti-bribery laws. Special care must be taken when exchanging gifts, meals, and entertainment with High Risk Vendors and Government Officials.

Gifts, meals, and entertainment can create or appear to create a conflict of interest between the team member's personal interests and those of the Company. No gift, meal, or entertainment should be exchanged if it will compromise or be perceived to compromise a team member's responsibility to make fair and objective business decisions on behalf of Stericycle.

Gifts, meals, and entertainment should be exchanged openly and transparently, at a reasonable time and place appropriate to the circumstances and should not create the appearance of impropriety or a sense of obligation or expectation.

Team members may not solicit gifts, meals, and entertainment for their personal benefit. Team members who wish to solicit a gift from a Business Partner on behalf of a charitable or non-profit organization must first seek pre-approval from the OEC and VP ESG. (For more on donations, see the Stericycle Charitable Donations Policy.)

Team members who exchange or authorize gifts, meals, and entertainment must also comply with Stericycle's Code of Conduct, Conflicts of Interest Policy, Anti-Corruption Policy, Government Relations Policy, and Travel and Expense Policy, as well as the requirements below.

All gifts, meals, and entertainment greater than the value limits must be disclosed via the [Gifts and Entertainment Registry](#) available on the OEC section of The Loop. Whether a gift, meal, or entertainment is approved often depends on the specific circumstances and must be considered on a case-by-case basis. Circumstances involving gifts, meals, and entertainment not covered in this Policy should be discussed with the Office of Ethics and Compliance (OEC) at ethicsandcompliance@stericycle.com before taking action.

5.1 Business Gifts

Value limits. Team members may give or accept gifts with a value up to \$50 USD (or the local currency equivalent) to or from Business Partners without OEC approval. The total of all gifts exchanged with a Business Partner in a calendar year must not exceed \$150 USD (or the local currency equivalent). This \$150 limit is calculated based on gifts to/from the Business Partner as a whole, and not each individual at the entity or organization. No Stericycle team members may engage in any type of arrangement with any Third Party to exceed these limits.

Gifts that exceed value limits. Written pre-approval is required from the OEC before giving gifts to a Business Partner with a value greater than \$50 USD or that exceed the \$150 USD annual limit.

Generally, when team members receive a gift that exceeds the allowable dollar limit, they should refuse or return the gift with a courtesy note explaining our policy. If that is not feasible, under appropriate circumstances, a gift that exceeds the allowable dollar limit may be kept and made available to all team



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members (e.g., by raffle, or first-come, first-served, placed in common areas in the office to be used by all TMs, if possible) without identifying the source of the gift.

Contact the OEC for guidance and determination of the proper course of action if:

- you are offered or receive a gift prohibited by this Policy or you have a question regarding the propriety of a gift;
- local gift-giving practices or customs conflict with this Policy; or
- you believe that returning a gift may impact a business relationship with the Business Partner. (An exception request will be evaluated in accordance with Section 6 below.)

Gift Policy Exclusions

Promotional logo-ed items that are less than \$50 or local currency equivalent (e.g., logo-ed pens, hats, mugs, etc.) are generally permitted.

Gifts costing more than \$50 USD received at an industry conference or event (e.g., attendee gift bags) are permitted provided they are available to all attendees and are not lavish or excessive.

Prizes awarded in games of skill or chance during business-related events (e.g., “closest to the pin” golf outing; door prize drawings at a seminar; event contests or raffles) are permitted provided all attendees have an equal opportunity to win the prize and:

- Giving prizes greater than \$50 USD must be pre-approved by the OEC.
- Team members who win prizes greater than \$50 USD should notify the OEC within 10 days after receiving the prize.

Prohibited gifts. The following types of gifts are never permitted to be given or received, regardless of the amount:

- Gifts intended to influence or reward an action / inaction or a business decision – or may appear to influence a decision. Gifts should be provided only as a courtesy or token of esteem.
- Cash and cash equivalents, such as gift cards, gift certificates, checks, wire transfers, or anything redeemable for cash, subject to the exception above.
- Gifts that violate the laws or policies of the intended recipient.¹
- Gifts that are offensive, sexually oriented or otherwise violate our commitment to mutual respect or reflect poorly on the Company or the team member.
- Gifts given to/from family or friends of Business Partners without prior approval from the OEC.
- Gifts provided by one team member to another and paid out of his/her own funds that are related to their performance or role at the Company. Such payments could be considered compensation and have tax implications.

5.2 Business Meals and Entertainment

¹ If unsure, please contact the Stericycle Legal department. Many countries impose limitations on gifts that may be exchanged, even among employees of private-sector companies. Additionally, many business partners have policies regarding acceptable gifts and business entertainment.



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Team members must exercise good judgment in accepting and providing Business Entertainment (e.g., business meals, tickets to sporting and cultural events, golf outings, galas or charity events). Business entertainment must include an appropriate balance between the business purpose and social, entertainment or leisure activities.

Value limits. Team members may give or accept business entertainment with a value up to \$120 USD per attendee (or the local currency equivalent).

Business Entertainment that exceeds value limits. Team members who reasonably anticipate giving or accepting Business Entertainment with a value greater than \$120 USD per attendee must get written pre-approval from the OEC.

Team members who give or accept unanticipated Business Entertainment with a value greater than \$120 USD per attendee without OEC pre-approval must disclose this to the OEC within 10 days of the event. The disclosure should include attendees' name, title and organization and an explanation of the expenditure (e.g., business rationale, circumstances for exceeding the value limit).

Business Entertainment must meet the following requirements:

- It is unsolicited by either party.
- It is for a legitimate business purpose and provides a reasonable opportunity to discuss business or further develop the business relationship.
- It does not create a conflict of interest, or the appearance of a conflict, based on surrounding circumstances (i.e., must not be offered or accepted in the middle of contract renewal/negotiations).
- It is permitted under the recipient's laws and policies.
- A Stericycle team member(s) and representative of the Business Partner both attend the meal or entertainment. For example, accepting tickets to a sporting event where the Business Partner does not attend is not permitted, unless the tickets are individually less than \$50 USD (this would be a gift and the gift limit applies).
- It is not excessive, lavish, extravagant or frequent, and is reasonable under local standards and customs.
- It is at a location and conducted in a manner that does not violate other Stericycle policies or the Code of Conduct, or which otherwise could harm the Company's reputation (e.g., an event at an "adult entertainment" venue is not acceptable).

5.3 Hospitality

Team members may provide or accept Hospitality – expenses for travel, lodging and associated meals – only where there is a bona fide business purpose that is directly related to (1) the promotion, demonstration, or exhibition of Stericycle services; (2) training or education related to Stericycle's business; or (3) performance or execution of a contract to which Stericycle is a party. (e.g., contractually required customer/supplier inspections)

Hospitality must be pre-approved in writing by the team member's manager and meet the following general requirements:



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- It is not excessive, lavish, extravagant or frequent, and is reasonable under local standards and customs.
- It is permitted under the laws and policies of the intended recipient.
- Payments in the form of a *per diem* (e.g., cash payments or “walking around money”) are strictly prohibited.
- Stericycle may not cover hospitality expenses for family members or friends of a Business Partner.

When providing approved Hospitality to a Business Partner, Stericycle should try to pay the service providers (e.g., airline, hotel, restaurants) directly rather than provide funds to the Business Partner for such expenditures. Hospitality expenditures, whether paid directly to service providers or as reimbursement to the Business Partner, must be supported by appropriate itemized receipts reflecting the specific expense being reimbursed.

Offers from Business Partners to pay team member admission or registration fees, travel or lodging costs relating to conferences, trade shows, and other events must be pre-approved in writing by the team member’s manager and by the OEC. Generally, if there is an appropriate business purpose for the trip, Stericycle should pay the travel and lodging costs.

5.4 Gifts, Meals, and Entertainment and Government Officials

Gifts, meals, and entertainment provided to or received from Government Officials deserve special attention. Gifts, meals, and entertainment that are acceptable with private-sector company employees often are inappropriate or illegal when dealing with government officials. Exchanging gifts, meals, and entertainment with Government Officials may violate U.S. and local anti-corruption laws and the Stericycle Anti-Corruption Policy and should be offered infrequently and under very narrow circumstances. In some jurisdictions, gifts, meals, and entertainment provided to Government Officials, even if appropriate and legal, may be required to be publicly reported by the Company.

All team members who interact with any Government entities and Government Officials must learn and comply with the rules that apply to government contracting, funding of government projects, and interactions with Government Officials. Typically, these rules prohibit or severely limit offering, promising or providing gifts, meals, or entertainment to Government Officials. In addition, Government Officials themselves are generally prohibited from soliciting, agreeing to accept or receiving gifts, meals, and entertainment.

In addition to criteria listed above:

- All expenditures made for the benefit of a Government Official must be approved in advance in writing by the Country Manager or his/her designee, and by the OEC.
- Low value refreshments, such as tea, coffee or snacks, which are provided to Government Officials (e.g., during an inspection or audit visit at our facilities) and are not frequent do not require pre-approval by the Office of Ethics and Compliance but must be disclosed on the registry.
- Team members who receive a gift, meals, or entertainment from a Government Official must disclose this to the OEC within 10 days after receipt.



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For more on gifts, meals, and entertainment involving Government Officials, see Appendix A as well as Stericycle's Anti-Corruption Policy and its accompanying Appendix A - Guidelines on Payments for the Benefit of Government Officials.

5.5 Sponsorships, Political Contributions and Charitable Donations

Sponsorships. Sponsorships intended to advance the business or provided as part of a marketing campaign should be documented in a written sponsorship agreement and approved by senior leadership. If the sponsorship agreement includes gifts, meals, or entertainment available to Stericycle team members (e.g., golf outings, sports tickets), these must be pre-approved by the OEC. .

Political contributions: Stericycle generally does not make corporate contributions or otherwise give an endorsement of support, directly or indirectly, to state and local candidates, political committees, political parties or ballot initiatives. In addition, Stericycle does not make any expenditures for electioneering communications, nor does it contribute to any organizations for the purpose of funding a political campaign. The Office of Government Relations and Public Affairs is responsible for managing the company's political and lobbying activities, in consultation with other senior leaders. To the extent the Company makes any U.S. corporate contributions or expenditures in the future, they will be published on the company website. A political contribution intended to influence or reward official action (or inaction), or to gain an improper advantage for Stericycle, will not be approved and must not be solicited from Business Partners or third parties in general. Team members are prohibited from making political contributions from their own pocket/funds on behalf of, or to benefit Stericycle. For more information, please review our [Political-Contributions-Policy-Statement.pdf](#).

Charitable donations: Donations are goods, in-kind services or funds provided by Stericycle in support of a social cause, without any direct commercial benefit to the Company. Please refer to the Charitable Donations Policy or the OEC or VP ESG for requirements regarding charitable donations.

5.6 Properly Accounting for Gifts, Meals, and Entertainment

Stericycle's books, records and accounts must accurately and fairly reflect, in reasonable detail, all transactions and dispositions of assets, whatever their amount. All gifts, meals, business entertainment and hospitality provided by the Company must be clearly, accurately and properly documented and recorded, in reasonable detail, in all books and records (including, e.g., ledgers, expense reports and pre-approval forms). This includes the name, title and organization of recipients of all expenditures covered under this policy.

6.0 EXCEPTIONS

Policy exceptions should be considered only in the following circumstances:

1. Unforeseen circumstance – events or circumstances unanticipated at the time of policy creation that render compliance unduly burdensome or inapplicable.
2. Country Legal requirement – following a legal assessment, it is determined that the policy conflicts with new or unanticipated local laws/regulations.
3. Business need – a clear business justification/need that cannot be met by adhering to the policy or procedure.



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Requests for exceptions to compliance-related policies and procedures must be properly documented and submitted to the Policy Owner or his/her designee prior to the occurrence of the transaction at issue. The documentation must identify the specific policy requirement at issue and the circumstances requiring the exception.

If the exception request is limited to a specific transaction, the Policy Owner will review the request, confirm the circumstances described by the requestor, identify potential alternatives, and assess the impact and potential risk created by the exception. If, in the judgment of the Policy Owner, the risk created by the exception is sufficiently limited or can be adequately managed, the exception will be granted. The Policy owner will document the facts and circumstances considered in evaluating and approving the request, including the individuals involved in the decision, and retain the documentation.

If the exception request would also require a permanent change in the compliance-related policy or process, the proposed change must be presented to the Policy Management Committee for review and approval.

Policy exceptions should be kept to a minimum and must not compromise the overall integrity and objectives of the policy in question. Failure to follow these requirements may subject individuals involved to disciplinary actions, up to and including termination.

7.0 DUTY TO REPORT AND NO RETALIATION

Team members and third parties who become aware of potential misconduct should report it as soon as possible to their supervisor, a department head, Human Resources, or the Office of Ethics and Compliance (ethicsandcompliance@stericycle.com).

In addition to the aforementioned reporting channels, Stericycle maintains a telephone and internet/web-based reporting service (the "Ethics Line") that is available to team members and third parties globally and is:

- Toll-free or otherwise available without expense to team members using it;
- Available 24 hours a day, 365 days a year;
- Operated by a third party;
- Available in local languages;
- Designed to ensure that calls are not recorded and are not subject to caller identification;
- Designed to permit anonymous reporting where allowed by law; and
- Designed to allow a reporting team member to check the status/outcome of his/her report and to exchange follow-up information.

The local Ethics Line telephone numbers can be found at www.stericycle.ethicspoint.com. Ethics Line reports can be made online through a secure website at www.stericycle.ethicspoint.com.

When reporting, team members and third parties should provide as much information and detail as possible, including, where applicable, the identity (first and last name) of the alleged wrongdoer(s); the first and last names of possible witnesses; and any documents that may support the concern or complaint.



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Stericycle prohibits any form of retaliation against a team member or third party who makes a report of misconduct in good faith. Likewise, the Company prohibits retaliation against any team member or third party who cooperates in a Company investigation.

8.0 ENFORCEMENT/STATEMENT OF CONSEQUENCES FOR FAILURE TO COMPLY

Compliance with this Policy is mandatory. Stericycle may, at its discretion, discipline those who fail to comply with this Policy, or who engage on any action to hinder an investigation or audit (e.g., hiding or destroying any information or documentation, providing false answers or false information, deleting email or other documents), up to and including termination of employment and possible legal action. Failure to appropriately report suspected misconduct may be a violation of the law and may also be grounds for disciplinary action, up to and including termination.

9.0 RELATED POLICIES AND PROCEDURES

- Code of Conduct
- Conflicts of Interest Policy
- Anti-Corruption Policy
- Travel & Expense Policy
- Delegation of Authority (DoA)
- Policy on Reporting and Internal Investigations
- Policy on Charitable Donations
- Gifts, Meals, and Entertainment Desktop Reference Guide
- Global Government Relations Policy
- Political Contributions Policy Statement

10.0 REVISIONS/REVISION HISTORY

Revision Number	4.0
Original Issue Date	October 2018
Last Review Date	October 2023
Effective Date	October 2023
Next Review Date	October 2024

This Policy must be reviewed and approved annually unless changes in relevant laws or business needs require more frequent review/revision. The Policy Owner is responsible for updating the Policy and management of prior versions.



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Gifts, Meals, and Entertainment Policy

Appendix A – Guidelines on Gifts, Meals, and Entertainment

In many countries, gifts play an important role in business protocol and customs. In addition to the Stericycle Gifts, Meals, and Entertainment Policy, the following guidelines may assist you in determining what, when and to whom it is appropriate to provide or accept gifts, meals, and entertainment.

Help in Identifying High Risks:

As the Policy states, it is important to identify Government Officials and High Risk Vendors as certain laws, regulations and policies pertaining to gifts, meals, and entertainment apply to them.

Government Official(s) include anyone who is a(n):

- Officer (elected, appointed, or career) or employee of any department, agency, or instrumentality of a government (federal, state, provincial or local), whether administrative, legislative or judicial, no matter the rank or function;
- Person acting in an official capacity for or on behalf of a government or any department, agency, or instrumentality of a government (either at federal, state, provincial or local level);
- Officer or employee of a government-owned or government-controlled (in whole or in part) enterprise, organization, company, or instrumentality;
- Any employee or officer of an entity hired to prepare a request for proposal or an invitation for bids, or to review and/or accept bids for any federal, state, provincial or local government or any department, agency, or instrumentality of a government;
- Official or employee of a public international organization (e.g., UN, World Bank, EU, WTO, NATO, Red Cross, FIFA, International Olympic Committee);
- Individual acting for or on behalf of a government or international organization, even though he/she may not be an employee of such government or organization;
- Any political party or official and/or employee of a political party and/or candidate for political office; and
- Individual who is considered a government official under applicable local law.

High Risk Vendors (HRV) are Third Party Representatives that interact with government agencies, officials and/or employees on behalf of Stericycle. They may include services such as:

- Payroll or benefits services
- Sales - consultant/agent/representative
- Marketing services
- Travel, conference or event services
- Assistance with public or private tenders
- Union relations
- Government lobbying
- Visa processing
- Waste collection/storage/transportation
- Resale of waste
- Processing or final disposition of waste
- Regulatory - consultant/expert/agent/broker
- Environmental - consultant/expert/agent/broker
- Assistance with licenses/permits/inspections
- Customs and cross-border services
- Any other role interacting with government agencies or officials



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There are a few areas to pay special attention to when considering giving or receiving gifts, meals and entertainment:

- 1) Conflicts of Interest – Consider if the exchange will compromise or be perceived to compromise an individual’s ability to make a fair and objective business decision.
- 2) The circumstances – Consider the circumstances under which a gift, meal, or entertainment is offered: the nature, value, frequency, and the intent. Is there a current RFP involving the recipient? If offered to influence or reward an action or decision of the recipient, or to gain an improper advantage, then the gift, meal, or entertainment may be viewed as a criminal bribe.
- 3) Third Party Representatives – Remember that the Gifts, Meals, and Entertainment Policy applies equally to the Company’s Third Party Representatives as well as to its employees. Employees must be vigilant in their dealings with Third Party Representatives to ensure that the Company is not funding, reimbursing, or authorizing (directly or indirectly) the provision of gifts, meals, and entertainment by Third Party Representatives to Stericycle’s Business Partners in violation of the requirements of this Policy.
- 4) High Risk Vendors - Risks associated with gifts, meals, and entertainment are particularly high when interacting with High Risk Vendors based on the business they conduct for the Company. They are acting on our behalf and we are assuming risk for their actions. Take a conservative approach to giving or accepting gifts, meals, and entertainment to/from High Risk Vendors, and clearly and accurately document in the Company’s books and records any such exchanges.

Generally, no gift, meal, or entertainment should be accepted or provided if it will compromise or be perceived to compromise an individual’s responsibility to make a fair and objective business decision.

Gift Guidelines:

All gifts above \$50 USD need to be disclosed on the Gifts, Meals, and Entertainment Registry. In addition to the guidance in the Policy, the following examples will help you determine if a gift can be accepted or given and when increased risks may exist.

Acceptable giving and receiving:

- Food received as Gifts, particularly around holiday times, may be accepted but should be placed in a common area and shared with team members.
- Promotional items that are insignificant in market value, such as logo-ed pens, hats, mugs, etc., generally are permitted independent of the individual \$50 USD limit and \$150 USD annual limit.
- Team members may accept tickets to entertainment or cultural events (e.g., sporting event, theater, etc.) from a Business Partner in excess of the \$50 USD limit provided the Business Partner also attends and other requirements are met - those would be considered Business Entertainment. (See Policy Section 5.2)
- Gifts individually costing more than \$50 USD given as prizes for games of skill or chance (e.g., “closest to the pin” golf outing; door prize drawings) are permitted provided all attendees have an equal opportunity to win the prize.
- Gifts individually costing more than \$50 USD given at a conference, summit or industry event (e.g., attendee gift bags) are permitted provided they are available to all attendees and are not lavish or excessive.



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- Team members who wish to solicit a Gift from a Business Partner on behalf of a charitable or non-profit organization must first seek approval from the OEC and the Charitable Donations Committee.

Areas to use caution:

- Gifts should be appropriate to the occasion under local standards and customs, and not be (or appear to be) lavish or excessive in value or quantity.
- Team members must not request or solicit Gifts (including services) from any Business Partner for themselves or others, including family members or friends.
- Team members must not solicit tips or gratuities for services performed as part of their duties with the company.

Obtaining Pre-Approvals for Gifts, Meals, or Entertainment to/from Government Officials

Plan ahead. The Office of Ethics and Compliance and the Country Manager must pre-approve in writing any gift, meals, or entertainment to be given to or received from a Government Official. Leave time to vet the situation with key stakeholders through the Pre-Approval Process described in Section 5.4 of the Policy.

Summary of Criteria to Apply when Providing Gifts, Meals, and Entertainment

Legal	Business Purpose	Approval	Reasonable and Customary	Appearance	Solicitation	Recipient
Must be legal under all applicable laws, including the FCPA and other local Anti-Corruption laws	Must serve a demonstrable business purpose	<p>Giver’s Manager must be aligned</p> <p>OEC approval required if gift value exceeds \$50 USD (or over \$150 USD in a calendar year)</p> <p>OEC pre-approval required for any spend on a Government Official*</p>	Must be reasonable, proportionate (i.e. not unduly lavish) and customary (including consideration of multiple gifts, meals or entertainment involving the same recipient)	<p>Must not create the appearance of impropriety or sense of obligation and is not inappropriate in relation to timing of any business decision (e.g. contract award or tender)</p> <p>Public disclosure of the gift, meal, or entertainment would not embarrass the Company</p>	Team members must not solicit gifts or business entertainment	Is limited to only those directly involved in the business at issue



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* Low value refreshments and meals, such as tea, coffee or snacks, which are provided to Government Officials at our facilities (e.g., during an inspection or audit visit) and are not frequent, do not require pre-approval by the Office of Ethics and Compliance but must be disclosed to the OEC.