

GIFTS, ENTERTAINMENT AND REIMBURSING EXPENSES

Guidelines to Code of Conduct in EVRY

EVRY

BACKGROUND

Code of Conduct v 1.0

Corruption and bribery

2.6 EVRY is opposed to all forms of corruption. You shall never offer or accept illegal or inappropriate monetary gifts or other remuneration in order to gain business or personal benefits for yourself or others. EVRY has a firm attitude to gifts, remunerations and activities that may be perceived to include elements of a gift. This applies to both how we treat our customers and how our employees and cooperating partners should approach this issue. **Special guidelines have been prepared to advise you on how to handle this kind of issues.** You are expected to acquaint yourself with these guides and to comply with it.

Gifts and business courtesies

2.8 You shall always exercise caution in relation to offering or accepting gifts and business courtesies. You shall under no circumstances accept gifts or other remuneration if it can be reasonably perceived that these are for the purpose of influencing business decisions. **Reference is made to the special guidelines prepared, advising you on how to handle these issues.** You are expected to acquaint yourself with this guide and to comply with it. If you are unsure of the situation, you must consult your immediate superior for guidance.

BASIS FOR THE GUIDELINES

- The Confederation of Norwegian Enterprise (Norwegian: Næringslivets Hovedorganisasjon – NHO) has published a guide for companies' work policies and practices with regard to gifts, entertainment and various expenses. (...crossing the line).
- These Guidelines we have adjusted to EVRYs business
- In the Guidelines you will find 3 categories of performance:
 - Gifts (goods, services, money)
 - Entertainment activities (meals, entertainment, courses, client activities)
 - Reimbursing of expenses for others aside from EVRY employees (travel and accommodation, money for food or pocket money etc)
- For each category you will find a number of examples of performance, distributed with a red, yellow or green classification
- To help you with the specific classification of your performance, some questions are stated for each of the three main categories of performance

CLASSIFICATION



Red classification

- Situations that should be avoided because they are obviously illegal or because there is a strong possibility that they may be illegal



Yellow classification

- Can in some circumstances be illegal or unethical but not necessarily



Green classification




- Legal and ethical in most cases

GIFTS

Consider the following:

- What is the purpose of the gift?
- Are you about to make an offer or are you about to enter into negotiations?
- Is it a personal gift or it is for the company?
- Is anything expected in return?
- Is it of significant or insignificant value?
- Could EVERY have given or received a gift of the same value?
- What ethical guidelines are the recipients bound by?
- Are the recipients public or private employees?
- Is the gift given openly or in an underhand way?
- Is the gift delivered to your house or to the workplace?
- Is the gift for lots of people or just one person?
- How often?

GIFTS (goods, services, money)

 UNACCEPTABLE	 BE CAREFULL	 NORMALLY ACCEPTABLE
Money (and things which can easily be redeemed for cash) Gifts with conditions attached	Personal gifts for special birthdays and other occasions	Gifts of little value, e.g. A bottle of wine or flowers when you have given a speech
Payments in the form of e.g. Work on the recipient's property or materials delivered to his house	Gifts to the company on big occasions	Gifts bearing the product image that are of insignificant value
Gifts with conditions attached	"Competitions" with prizes that can be regarded as gifts	Reward points to employees as private individuals as part of an open bonus scheme (flight/hotels etc)
Return commission for an individual	"Thanks for your help" gifts	
Gifts that can have an influence on a situation where you are about to make an offer or enter into negotiations		




ENTERTAINMENT ACTIVITIES

Consider the following:

- What is the purpose of the invitation?
- Are you about to make an offer or are you about to enter into negotiations?
- Is the invitation for one person or to the company? Have you discussed who should go?
- Is anything expected in return?
- Is it of a significant or insignificant value?
- Could EVRY has given or accepted a similar invitation?
- What ethical guidelines are the recipients bound by?
- Are the recipients public or private employees?
- Are several people or just one person invited?
- How often?
- Who pays for travel and accommodation?
- Is the professional content of adequate quality and relevance?

ENTERTAINMENT ACTIVITIES

(meals, entertainment, courses, client events)

 UNACCEPTABLE	 BE CAREFULL	 NORM. ACCEPTABLE
<p>Expensive trips, accommodation and events with little professional content, where expenses are met by someone other than your employer</p>	<p>Professional events where travel and/or accommodation is paid for by others</p>	<p>Working lunch or dinner within ordinary cost level</p>
<p>Entertainment or events that are provided in order to influence a negotiation or purchase</p>	<p>Tickets to sporting and cultural events</p>	<p>Professional events with a professional content of adequate quality and relevance where the participant's employer pays for travel and accommodation</p>
<p>Sexual favours</p>	<p>Expensive meals</p>	<p>Inclusion of partner if fully paid by the employee</p>
<p>Inclusion of partner if not fully paid by the employee</p>	<p>Invitation to private occasions (holiday home, wedding etc.)</p>	




REIMBURSING OF EXPENSES FOR OTHERS ASIDE FROM EVRY EMPLOYEES

Consider the following:

- Why should EVRY pay for or have the expenses reimbursed? Is this clearly business-related?
- Are the expenses relevant, and can they be verified?
- Is it possible for EVRY to handle payment instead of advance payment?
- Is the payment for the expenses agreed with the recipient's company, and not just with the individual receiving it?
- Are you about to make an offer or are you about to enter into negotiations?
- Is it of significant or insignificant value?
- What ethical guidelines are the recipients bound by?
- Are the recipients public or private employees?

REIMBURSING OF EXPENSES FOR OTHERS ASIDE FROM EVERY EMPLOYEES

(travel and accommodation, money for food or pocket money etc)

 UNACCEPTABLE	 BE CAREFULL	 NORM. ACCEPTABLE
Cash payments without statements and documentation	Advance payments or cash payments (provided that there is an agreement regarding use along with documented expenses)	Participating at the host's own professional events (provided that travel and accommodation cost are met by his/her own company)
Covering of expenses other than the normal accommodation costs through the hotel bill	High standard accommodation	Shared transport (e.g. minibus) over moderate distances
Payment of personal expenses	Trips over long distances, expensive tickets	
	Covering of expenses for partners	
	The payment of expenses for public employees	

IF YOU ARE UNSURE

Do not hesitate to consult:

- your immediate superior *or*
- Compliance Officer (compliance@evry.com)

Your compliance with EVRY's Code of Conduct, its' special guidelines as well as local legislation and behaviour according to EVRY's values and ethical standards is your responsibility!
