



ASAHI EUROPE & INTERNATIONAL

AEI Anti-Bribery Policy

November 2025

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Introduction

Title	AEI Anti-Bribery Policy
Level	Operational
Applied to	All employees
Confidentiality	Internal Use Only
Contact Information	HUB Legal
Effective Date of this Version	26 November 2025
Original Effective Date	1 December 2017
Version	No. 3
Reference	The Asahi Group Code of Conduct The Asahi Speak Up Policy AEI Anti-Bribery Policy – supplier Global Supplier Code of Conduct

Purpose and Scope of the Policy

Asahi Europe & International has utmost interest in setting standards of integrity and business ethics and strictly prohibits any form of bribery.

Asahi Group Code of Conduct states that we will not participate in any form of bribery or corruption, directly or indirectly and it is important that we avoid actions that may give rise to an appearance or suspicion of bribery or corruption, such as the provision of gifts or entertainment that would breach local laws and regulations, or contravene commonly accepted social standards .

Most countries in which Asahi Europe & International companies operate have laws that prohibit the offer, giving or receiving of improper advantages or payments, such as bribes. An increasing number of countries have also adopted laws that prohibit bribery even when it is committed outside their own borders (particularly in the case of payments to public officials).

Violating these laws is a serious criminal offence which can result in significant civil and criminal penalties for both the company and for you personally (including substantial fines and imprisonment), and significant reputational damage for the company.

To whom does this policy apply

- 01** This policy applies to Asahi Europe & International Ltd., its subsidiaries as well as other companies it directly and indirectly owns or manages ("AEI").
- 02** This Policy applies to all employees, directors and officers of AEI, including temporary or contract staff ("Employees"). Employees must ensure that they do not become involved in any way in the payment of bribes or kickbacks, whether in the public or commercial sector. Employees must understand and comply with applicable anti-corruption legislation.
- 03** This policy sets out the minimum standards to which all Employees of AEI must adhere at all times.

Where to find help

- 04** If you have any concerns or doubts about the legality or integrity of a particular payment or receipt, you should immediately seek advice from your line manager, local Head of Legal or alternatively the AEI Legal Director, or the AEI Head of Internal Audit & Control.

What is bribery

- 05** Bribery can be described as the giving to or receiving by any person of anything of value (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business or any other benefit.
- 06** Bribery can take place in the public sector (e.g. bribing a public official) or private sector (e.g. bribing the employee of a customer). Bribery can also take place where an improper payment is made by or through a third party.
- 07** Bribes and kickbacks can therefore include, but are not limited to:
 - a.** gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses;
 - b.** payments, whether by Employees or business partners such as agents, introducers or consultants;
 - c.** other 'favours' provided to public officials or customers, such as engaging a company owned by a member of a public official's or customer's family or making a donation to favoured project or charity; and
 - d.** the uncompensated use of company services, facilities or property.

Our policy on bribery:

(i) General

- 08** No AEI company or Employee is permitted to pay, offer, accept or receive a bribe in any form. You must never:
- Offer, pay or give anything of value to a public official in order to improperly obtain business or anything of benefit to AEI. "Public official" should be understood very widely, and broadly means anyone paid directly or indirectly by the government or performing a public function, including officials of state-owned enterprises and public international organisations.
 - Attempt to induce a public official, whether local or foreign, to do something illegal or unethical.
 - Pay any person when you know, or have reason to suspect, that all or part of the payment may be channelled to a public official. You should therefore be careful when selecting third parties, such as agents and consultants (see guidance below).
 - Offer or receive anything of value as a "quid pro quo" in relation to obtaining business or awarding contracts. Bribery of "public officials" is a serious matter, but bribery of those working in the private sector is also often illegal and is always contrary to AEI's standards of business conduct. Any gifts or entertainment offered to or by an Employee must comply with the applicable local policy.
 - Establish an unrecorded ('slush') fund for any purpose.
 - Otherwise use illegal or improper means (including bribes, favours, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or offering anything of value when you know it would be contrary to the rules of the recipient's organisation for the recipient to accept it.
 - Make a false or misleading entry in the company books or financial records.
 - Act as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback.
 - Do anything to induce, assist or permit someone else to violate these rules.
 - Ignore, or fail to report, any suggestion of a bribe.
- 09** As well as complying with the specific prohibitions in this Policy, Employees must exercise common sense and judgement in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.

(ii) Facilitation payments

- 10** AEI's policy is that so-called "facilitation" or "grease" payments are prohibited. Such payments should not be made to public officials, even if they are nominal in amount and/or common in a particular country. If relevant, AEI should provide Employees with training and support in resisting payments.

(iii) Agents and Intermediaries

- 11** Employees should not hire an agent, consultant or other intermediary if they have reason to suspect that they will pay bribes on AEI's - any of the AEI' behalf.
- 12** Employees should seek to ensure that any third parties that are hired will not make, offer, solicit or receive improper payments on behalf of AEI. All fees and expenses paid to third parties should represent appropriate and justifiable

remuneration for legitimate services to be provided and should be paid directly to the third party. Accurate financial records of all payments must be kept.

- 13** AEI should adopt appropriate procedures directed towards ensuring that their arrangements with third parties do not expose them to liability under any applicable anti-corruption laws. Such procedures should assist Employees in determining whether particular third parties (or category of third parties) present a corruption risk and, if so, what steps should be taken to address that risk. This may include, in particular, cases where a third party is engaged to act on AEI's behalf:
- to solicit new business;
 - to interact with public officials; or
 - in other high-risk situations.
- 14** There may be circumstances where an AEI group company deems a category of third party relationship sufficiently low risk so as to negate the need for any additional procedures.
- 15** However, in cases which do present a corruption risk, AEI should consider whether it is appropriate to:
- undertake due diligence to verify the third party's reputation and integrity;
 - emphasise to the third party, where appropriate, the need to act firmly within ethical boundaries;
 - document the relationship in a written contract containing provisions dealing with the following:
 - the nature of the services to be provided and fees to be paid;
 - a prohibition on paying bribes of any sort;
 - a requirement to keep accurate books and records and provide information to AEI to enable it to monitor compliance with the anti-bribery obligations;
 - take advice, where relevant, to ensure the arrangements are legal under all applicable laws; and
 - monitor the activities of the third party.
- 16** Employees must also be aware of factors which suggest the third party may pose a high corruption risk, and consult with their line managers (or otherwise as required by local procedures) to assess whether there is a need for enhanced due diligence and monitoring, or whether a proposed relationship should not proceed.
- 17** Examples of key red flags include:
- the fee demanded by the third party is not justifiable given the services to be provided; or is out of line with comparators; or involves a success fee (or, for example, in the case of lawyers, a percentage of any award) which is disproportionate to the value of the services offered and which could provide an incentive to the third party to pay a bribe.
 - the third party has links to public officials or customers on whose behalf he will be interacting on behalf of the company.
 - a history of improper activity (whether related to bribery and corruption or other ethical violations) on the part of the third party (in this case the third party should not be retained, save in exceptional circumstances).
- 18** These are only examples of red flags and employees should be alert to other situations which could give rise to concern. A combination of red flags creates enhanced risk.

(iv) Charitable and Political Donations

- 19** No political donations or payments may be made, nor any political expenditure incurred.
- 20** In addition, charitable donations can in some circumstances be used as a disguise for bribery, for example where a donation is provided to a 'charity' which is controlled by a public official who is in a position to make decisions affecting AEI. Therefore, whilst AEI supports community outreach and charitable work, AEI may only make a charitable donation provided it has been subject to suitable due diligence and approvals processes, and is appropriate in all the circumstances. AEI must understand who the actual recipient of the donation is and for whose benefit the donation is ultimately made. In addition, donations can only be made if:
- they are made in accordance with all local country legal requirements;
 - they are appropriately documented and publicly reported (where required by local law);
 - they are made to, and for the benefit of, recognised charities rather than individuals;
 - they are not conditional on a course of action by any individual or organisation – there must be "no strings attached";
 - they are not made to secure any improper business or other advantage; and
 - they do not create the appearance of impropriety or a violation of any local country legal requirements.
- 21** The process for charitable donations is conducted according to the guidelines in Annex 1 to this policy.

(v) Gifts, Entertainment and Hospitality

- 22** AEI has a zero-tolerance policy towards bribery and corruption. This prohibition extends to all the Group's businesses and transactions in all countries in which it operates.
- 23** This guidance does not include gifts or entertainment extended among or between people employed within the AEI. If you are not sure as to whether a gift or entertainment can be given or received in accordance with this policy, then you should contact your line management who will be able to advise you.
- 24** All AEI companies are expected to have a policy covering gifts, entertainment and hospitality ("G,E&H") . The policy must:
- adhere to the requirements set out in the Asahi Group Code of Conduct;
 - clearly define and clarify the Group company's position on the types of G,E&H that are acceptable and the types of G,E&H that are strictly prohibited;
 - be fully compliant with all local laws and regulations.
- 25** Whilst setting out the minimum requirements for a local G,E&H policy, this guidance may be tailored as appropriate by AEI companies by introducing different threshold values, introducing additional guidance, prohibiting particular types of G,E&H, or making them subject to further approvals. Local G,E&H policies must not permit gifts and entertainment to be given which would be prohibited under this Policy.
- 26** AEI and AEI Procurement maintain relationships with many different stakeholders, including customers, suppliers,

contractors, consultants and other stakeholders. It is important that these relationships have a strong ethical basis and any decisions affecting stakeholders are made on sound commercial grounds.

- 27** Whilst AEI recognises that gifts and entertainment can help maintain relationships and build goodwill, there is a danger that the improper giving or receiving of gifts can lead to an actual or perceived conflict of interest and damage both the AEI's business and reputation.
- 28** It is important not only to do the right thing but also to be seen to be doing the right thing – third parties must never be in any doubt as to our motives and drivers.

What are Gifts, Entertainment and Hospitality?

- 29** In this policy, gifts, entertainment, hospitality and sponsored travel are referred to collectively as "G,E&H".
- 30** Gifts, Entertainment and Hospitality mean anything of value given or provided to you or a close relative or provided by you to a third party in connection with your work for AEI. This will include but is not limited to: Supplier/Customers' products, Supplier/Customer' branded clothing or items, tickets to sporting or cultural events, meals, discounts, loans, cash travel or transportation, favourable terms on products or services, prizes, trips, hospitality events, shares, gift vouchers, invitations to conferences.
- 31** Business gifts and entertainment are customary courtesies designed to build goodwill among business partners. In some cultures, they play an important role in business relationships. However, a problem may arise when such courtesies compromise, or appear to compromise, the ability to make objective and fair business decisions. Offering or receiving any G,E&H that may be perceived to unfairly influence a business relationship must be avoided.
- 32** The provision of competition prizes or of trade incentives to customers' employees as part of usual promotional activity is not considered to be a gift.

Giving G,E&H

- 33** Gifts and entertainment should only be provided where they are appropriate, consistent with reasonable business practice, and would not be perceived to have any improper influence on the recipient. Additional guidelines are provided in the following sections as to gifts and entertainment which are never acceptable; gifts and entertainment which will normally be acceptable; and gifts and entertainment in relation to which preclearance is required.
- 34** Employees should use good judgment in offering gifts and entertainment; "everyone else does it" is not sufficient justification. Consider whether public disclosure of the gift or entertainment would be embarrassing to AEI or to the recipient; if so, it should not be provided.
- 35** Employees should be aware that in some situations, provision of gifts or entertainment may violate the law, and extra care should be taken when dealing with government officials. Further, some gifts and entertainment are never acceptable, for example cash or cash equivalents, or any gift or entertainment that would harm AEI's reputation. In addition, employees are expected to be aware of the organisational rules and policies of those to whom the employee intends to provide a gift or entertainment. If there is a conflict between their policies and the AEI's policies, an employee must follow the more stringent standard.
- 36** Meals or catering at meetings should always be provided in a manner suitable to the meeting and within reasonable

expectations. The provision of alcoholic beverages may be acceptable as part of the hospitality offered, but only if appropriate to the setting, acceptable to all attendees and always subject to moderation. The AEI Employee Alcohol Policy applies.

- 37 Event tickets should only be given if they are appropriate, and do not compromise the ability to make objective and fair business decisions and are in line with any specific rules implemented in local policies.
- 38 Free products or similar G,E&H should only be provided in a reasonable amount based on the location, sales or performance indicators of the business entity, and to the authorized employee of the business partner. This could be done as part of trade or sales incentives such as to establish the business relationship, increase our product visibility or volume distribution, following standard business terms and conditions.
- 39 Offering the above and other specific types of gifts and entertainment shall follow local gifts and entertainment rules and may be subject to additional rules or thresholds.
- 40 In determining whether a specific gift or entertainment item lies within the bounds of acceptable business practice, Employees are encouraged to discuss the issue with their line manager, director of the relevant function or responsible Legal person. The approval, if needed according to this or any local policy, may need to be secured in line with the rules of this policy or in line with the applicable Travel and Expense policy.
- 41 Offer, pay or give anything of value to a public official in order to improperly obtain business or anything of benefit to AEI is forbidden. "Public official" should be understood very widely, and broadly means anyone paid directly or indirectly by the government or performing a public function, including officials of state-owned enterprises and public international organisations.

G,E&H that are Always Wrong

- 42 Employees must not request, accept, offer or provide gifts or hospitality designed to induce, support or reward improper conduct in connection with any business or anticipated future business involving AEI: for example, where the G,E&H might be seen as intended to compromise the receiver's judgment and integrity. This requirement extends to the provision or acceptance of G,E&H through third parties, or to family members of an Employee of an actual or a potential customer.
- 43 The following are always wrong:
 - a. gifts of cash or equivalents (e.g. gift certificates, loans, shares or share options);
 - b. any inappropriate G,E&H (e.g. anything that is indecent or sexually explicit or which might otherwise adversely affect Asahi International's reputation or commitment to respect and decency).
 - c. G,E&H that breaches any local law or regulation, or any rule of the recipient's organisation. If there is any room for doubt in this regard, the recipient should always be asked to confirm in advance that acceptance by them would not contravene any applicable rules and has been approved;
 - d. G,E&H given or offered as a "quid pro quo", i.e. as part of an agreement that something should be done in return for the G,E&H. Similarly, G,E&H which may be seen as having a material effect on any business transaction which has been, or which may be, entered into by Asahi

International, or which might otherwise give rise to a conflict of interest, are prohibited;

- e. Not recorded properly in the company books.

G,E&H that are usually acceptable

- 44 You should use your own judgement to assess what is acceptable, taking account of any applicable local policy and the requirements for approval below. If you are not sure whether a certain gift is usually acceptable or not, talk to your line manager.
- 45 Modest G,E&H may usually be offered or accepted, provided there is no expectation or belief that something will be given in return.
- 46 Modest G,E&H includes those which fall under any limits specified by local gifts and entertainment policies (which must not set any threshold in excess of €250 from any one source in any calendar year), and which fall within the following categories:
 - a. small gifts, including gifts of nominal value such as t-shirts, calendars, diaries, pens and other small promotional items such as samples;
 - b. common courtesies such as drinks, food or modest refreshments provided in connection with a legitimate business meeting;
 - c. occasional modest meals with people with whom you conduct business;
 - d. occasional attendance at entertainment events of modest value, e.g. a musical performance, the theatre or a sporting event, where this is reasonable in the business context;
 - e. necessary and reasonable travel expenses in connection with legitimate business trips.

When is Approval Required?

- 47 You must always seek prior approval for:
 - a. any gift, entertainment or hospitality whose value exceeds under any limits specified by local gifts and entertainment policies;
 - b. G,E&H which does not fit into the categories of 'G,E&H that are usually acceptable' (above);
 - c. Special events – such as a football match or sports event (these will usually exceed the relevant value threshold);
 - d. Entertainment involving parties involved in a tender or competitive bidding process where a Group company is bidding (gifts should not be given in such circumstances);
 - e. Travel or entertainment lasting more than a day;
 - f. G,E&H which for any other reason you think might not be appropriate.
- 48 In determining whether to approve something in the "seek prior approval" category, line managers and senior management will use reasonable judgment and consider such issues as:
 - a. Whether the gift or entertainment would be likely to influence your objectivity.
 - b. Whether there is a business purpose (for example, will business be discussed as part of the event in question?).
 - c. What kind of precedent it would set for other Employees.
 - d. How it would appear to other Employees or people outside the company.

49 As well as considering the proportionality and intent behind the proposed G,E&H, you should also consider the frequency and appropriateness of its timing. Relatively modest G,E&H which is given/ received frequently or, for example, during a contract negotiation period could be perceived as inappropriate. Therefore, even where a particular proposal does not exceed the approval threshold, you must satisfy yourself that it is not appropriate or prudent to seek approval, and such factors will also be born in mind when approving expenses.

Giving gifts to Public Officials

- 50** Giving or offering G,E&H to a public official raises special risks. In addition to the guidelines set out above, never:
- a. offer, provide or approve gifts, gratuities or entertainment of any type or financial value to a public official or government employee "with strings attached" – The key prohibitions relate to providing something of value to a public official with a view to obtaining something in return (a "quid pro quo");
 - b. offer or make a payment to a public official – Any payments which are made for the benefit of a public official personally are prohibited. By contrast, payments to government bodies and government departments do not normally give rise to any corruption problem;
 - c. offer or make a payment to political parties (which may be for the benefit of candidates running for election).
- 51** The following are considered acceptable expenditure in respect of public officials:
- a. Entertaining and building relationships – Legitimate and reasonable hospitality and promotional expenditure, given in good faith, which seeks to build relationships and enhance dialogue, with no strings attached, is recognised as an established and important part of doing business. It is not the company's intention to prohibit such activity.
 - b. Customary gifts of a reasonable value – In some cultures it may be customary to give and receive small gifts, for example on festive occasions. Such gifts are permissible if they are:
 - i. Permitted by the official's internal rules;
 - ii. Customary in the business context;
 - iii. Modest and reasonable in value;
 - iv. Unconnected with any business decision it is known the official will be making; and
 - v. In accordance with this Policy, and approved by your line manager, the local legal department or the Head of Legal, Asahi International.
- 52** If you are in any doubt as to whether particular expenditure is permissible, you must seek advice from your line manager, or alternatively the local legal department.

Receiving G,E&H

- 53** Employees must not actively solicit or demand any form of entertainment or gift from any person or organisation outside Asahi International.
- 54** Employees are permitted to accept gifts and hospitality, provided (a) the G,E&H does not fall within any of the categories of G,E&H that are never acceptable (above) and, (b) in the case of G,E&H in excess of €250 or of any limits specified by local gifts and entertainment policies, appropriate approvals have been provided.
- 55** If the gift or hospitality does not satisfy these requirements, it should be politely declined. If, in exceptional circumstances, it is not possible to decline a gift (for example, because that would cause serious offence), it must be declared as soon as possible thereafter, following any procedures set out in your local gifts and entertainment policy. Gifts will remain company property and may be kept by the company, sold or donated at the discretion of Senior Management. If appropriate, a letter should be sent to the donor explaining your company's policy with respect to gifts.

Documenting G,E&H

- 56** All G,E&H notified as being in excess of the approval thresholds must be fully documented in HOPS Gift Register module (accessible via "View my Profile" and then "Gift Register" and approved by line manager) or an appropriate local gifts and hospitality register (or other mechanism for recording G,E&H which permits G,E&H expenditure to be identified and monitored). The record should state the nature and purpose of the expenditure and the giver/receiver of the business courtesy. Such records will be subject to periodic review.
- 57** The cost of provided G,E&H should be claimed under the applicable Travel and Expenses policy, if appropriate.

Personal expenditure:

- 58** Employees must never avoid their obligation to report or seek approval for any business entertainment or gift by paying personally for it in circumstances where they would otherwise be required to report and/or seek approval for it.

HUB Gifts:

- 59** Where a gift is received by an Employee on HUB level and where it is impractical to return it, or where offence may be caused, and does not fall into category always wrong, it will be in all cases donated to a raffle with benefits going to a local charity or other good cause. The raffle and local charity selection will be managed by Corporate Affairs. If an unsolicited gift is received under these circumstances, and if it is practicable to do so, the supplier should clearly understand that the gift will not be accepted personally.
- 60** All gifts that are received and are not placed in a raffle must be recorded in the applicable Gifts Register.

Reporting of Bribery and Suspicious Activity: Our Speak Up Policy If you become aware of any actual or suspected breach of this Policy, you must report this to your line manager, or alternatively using the Speak Up hotline, or contact the AEI Legal Director, or the AEI Head of Internal Audit & Controls, in accordance with the Asahi Speak Up policy.

- 61** Processes are in place to ensure that such complaints are investigated, and appropriate action is taken. AEI will not permit retaliation of any kind against any Employee for making good faith reports about actual or suspected violation of this Policy.
- 62** Failure to comply with this Policy may lead to employees being subject to disciplinary action, up to and including dismissal.

Annex 1: Charitable Donations Guidelines

1. Purpose

- 01** The purpose of these guidelines is to ensure that all charitable donations made by AEI group companies comply with legal requirements, uphold ethical standards, and align with our Purpose, strategic objectives and values.

2. Scope

- 02** These guidelines apply to all charitable donations made by Asahi Europe & International (AEI), whether financial or in-kind in the form of free products given to an outside non-Asahi entity, and govern the process of soliciting, reviewing, approving, and documenting such donations.
- 03** Further market level restrictions may be applied.

3. Eligibility Criteria

- 04** Charitable donations may only be made to entities with a valid company ID number (subject to local legislation) and a bank account.
- 05** Recipient organizations must align with AEI's strategic priorities, which include initiatives and organizations focused on social activities, environmental protection, emergency response, and local community development.
- 06** Donations should primarily support recognized charities rather than individuals, unless justified by specific circumstances.

4. Donation Purposes

- 07** Donations may be made for purposes including but not limited to:
- Social assistance for individuals and families in need
 - Integration and reintegration of marginalized individuals
 - Equal rights and diversity & inclusion initiatives
 - Local community development projects
 - Environmental protection and conservation efforts
 - Protection of human rights and civil liberties
 - Disaster relief and humanitarian aid
 - Volunteering
 - Initiatives promoting responsible and moderate alcohol consumption

5. Due Diligence and Approval Process

- 08** Any request for a donation must be submitted in writing (paper or electronic format) to the Corporate Affairs Director (CAD) or local CA employee designated by CAD. Potential requests by the Corporate Affairs shall be submitted in the same manner to the Managing Director (MD). All, including low value, donations must be captured in a register of donations maintained by the designated CA employee.
- 09** Donation Request & Approval form must be completed by requestor for each donation request, ensuring compliance with legal requirements, alignment with AEI business strategy, and adherence to exclusion criteria. To speed up the approval process, the designated CA employee can keep a list of charities that have already been approved.
- 10** Requests can be initiated by external entities (NGOs, Charities, etc.) or AEI employees. In the case of a negative decision, Group company inform the applicant institution without the reasons for the decision.
- 11** Should any resulting charitable donation be approved, all communications (internal and external) from any party around the donation require approval of the Corporate Affairs Director (CAD) or CA employee designated by CAD.
- 12** Administrative processes relating to payments shall follow local policies.

6. Annual Review Process

- 13** CA will implement an annual review process, supported by Legal to assess the charitable donations program, identify any areas for improvement, and ensure ongoing compliance with AEI requirements. A sample based review of charitable donations, irrespective of value, will be performed and suggestions will be communicated to appropriate employees based on the outcome of this annual review.

7. Documentation and Record Keeping

- 14** All applications for donation, supporting documents, and decisions are collected electronically by a designated employee of the CA function and stored on dedicated folder.

8. Training and Awareness

- 15** All relevant employees involved in the donation process will receive information on these guidelines to ensure proper understanding, implementation and observance.

9. Conclusion

- 16** These guidelines aim to foster transparency, accountability, and ethical conduct in AEI's charitable donation practices, safeguarding against potential risks such as bribery or improper influence.

Owner: Markus Kürten		Approver/Issued by: Andrew Bailey		Policies Portal Administrator: Karolina Snuzska		Effective from: 1 December 2017	
Revision							
No.	Date:	Change description:				Revised by:	
1	29 November 2021	AEI template and AEI references updated.				Martin Vrba	
2	27 June 2024	Policy revisions: <ul style="list-style-type: none"> • Deletion of reference to the political donations policy. • Additional gift offering guidance including examples about meals and catering, event tickets, free products, etc. • Clarification of the approval of HUB gifts placed in the raffle. • The expectation of HUB employees not to accept gifts and donate them to the charity raffle is clearly stated in the Policy. • Updated wording to match information from the update Group Code of Conduct and newly issued Speak Up policy. • Updated wording to clarify that gifts shall be registered in HOPS gift module for HOPS enabled markets. • Introduction of formalized Charitable donations guidance as an annex to this policy. 				Martin Vrba	
3	26 November 2025	<ul style="list-style-type: none"> • Updated HUB gift registering guidance in point 60. • Updated policy template to the latest version. 				Martin Vrba	