

BMC S.R.L.

Anti-

Corruption

Code of

Conduct

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1. Principles of the Code

BMC requires its employees and collaborators to operate with constant honesty and integrity. This Anti-Corruption Code of Conduct (hereinafter the "Code") been drafted with the purpose of protecting employees and BMC from any violation of corruption regulations and is to be applied to all employees, as well as other individuals or companies that perform activities in the name and on behalf of BMC, even if they are not directly employed by BMC.

BMC does not allow any form of corruption and is committed to complying with the anti-corruption laws in force in all countries in which it operates.

The purpose of this Code of Conduct is to guarantee the principles of transparency, to ensure clarity of permissible conduct and compliance with relevant anti-corruption regulations wherever BMC conducts business and to ensure that the highest levels of integrity are maintained.

The Code also sets out BMC's policy on the receipt and offering of gifts, hospitality and entertainment (i.e. the provision of goods and services free of charge, for promotional or public relations purposes), as well as the consequent responsibilities of those involved.

BMC recognises that the giving and receiving of gifts, hospitality and entertainment may occur in the ordinary course of business and recognises that this practice may vary significantly depending on the geographic area in which BMC operates. However, regardless of local laws and customs, certain gifts or acts of hospitality may be construed as actions performed or suffered BMC the purpose of inappropriate influence or may indicate the presence of a conflict of interest. Under certain circumstances, the giving and/or receiving of gifts and entertainment may be considered an act of bribery and therefore illegal and detrimental to BMC's reputation, such that those involved and the company could be prosecuted.

BMC, its Employees and/or Third Parties are therefore absolutely forbidden to give, promise, offer, request or receive any gift, gratuity, gift or hospitality whose nature or value can be considered even potentially excessive or unusual. This principle is intended to ensure that no gift or act of hospitality legitimately received or given shall be considered an offence of inducement designed to create an undue commercial advantage for BMC.

This Code defines guidelines to ensure compliance with the above-mentioned principles. The purpose of the Code is to ensure that the highest

standards of integrity and there is no suspicion of inappropriate motivation behind the offer or acceptance of the gift or act of hospitality, or undue influence exercised on the recipient, or by the recipient accepting such an offer.

This document must be considered in conjunction with the BMC Code of Ethics.

2. Definitions used in the Anti-Corruption Code

BMC: BMC S.r.l..

Act of corruption: one of the following options:

offering, promising or giving any benefit of value to inappropriately influence a person in order to obtain a benefit for BMC; or

requesting or accepting any benefit by way of remuneration for an inappropriate action or inducement to act inappropriately for the award of an assignment by BMC.

Instruments of corruption include money, gifts, acts of hospitality, expenses, reciprocal favours, financing of political parties or contributions to charitable organisations, as well as any other direct or indirect benefit or consideration.

Bribery/Corruption: a generic term used to describe any corrupt conduct. *It includes, inter alia*, both active and passive acts of bribery, any fraudulent act or conduct that puts one's own interests in conflict with those of BMC in the conduct of its business within the company. Bribery also means abuse of power or abuse of office in exchange for money or political favours.

Employees: all employees who perform activities on behalf of BMC, whether or not they are direct employees.

Facilitation Payments: payments required by Public Officials in order to expedite routine official procedures such as the issuance of licences, authorisations or other official documents or governmental documents such as visas and contract awards.

Public Officials: officials of any department or agency at local, national or international level; officials of any public international organisation (e.g., International Patent Office, European Investment Bank, European Commission, Customs Agency, Inland Revenue Agency, Municipality, etc.); political parties and party leaders; candidates for public office; executives and employees of state-owned or state-controlled companies; anyone acting on behalf of any of the above officials; any person holding legislative, administrative or judicial office.

Third Parties/Third Parties: includes agents, brokers, partners, consultants (both freelancers and companies) and other representatives who perform activities on behalf of or in the interest of BMC.

3. Application of the Code

This Code applies to all BMC employees and third parties who perform activities for or on behalf of the company, even if they are not directly employed by it.

The application is also extended to all foreign companies of BMC and to Employees and Third Parties located anywhere, regardless of their geographical location.

Employees and Third Parties shall be familiar with the applicable regulations in each jurisdiction in which they conduct business on behalf of BMC.

4. Corruption

Giving, paying, requesting or receiving, directly or indirectly, money or other benefits in an improper manner is considered illegal and violates this Code. **There are no monetary limits identifying a payment as an act of bribery.** Any transaction of money or any valuable benefit characterised by the intention to unduly influence the actions of another person is considered an act of corruption. It also includes payments or gifts given as compensation for improper actions performed by another person. For the purposes of establishing whether a criminal offence has been committed, the mere act of offering or requesting money or other benefits is sufficient, regardless of the outcome of the transaction in question.

These principles are applied equally in each jurisdiction in which BMC operates.

It is forbidden to make any kind of payment, offer or receive any valuable utility within the relations with Public Officials in order to obtain or maintain an assignment or any other commercial advantage in favour of BMC. In the relationships with any subject of private law it is also forbidden to accept or offer money or utilities that can be configured as acts of corruption.

5. Facilitation Payments

Facilitation Payments constitute a form of bribery or corruption. Any kind of payment or giving of benefits to a Public Official in order to obtain or retain an office or any other business advantage for BMC constitutes unlawful conduct.

In some countries it is common practice for Public Officials to request Facilitation Payments. However, BMC prohibits Facilitation Payments anywhere in the world and, despite local custom, will consider them to be a violation of this Code.

If you are asked to make a payment on behalf of BMC, you must always be aware of the purpose of the payment and determine whether the amount requested is proportionate to the goods supplied or services rendered. You should also always request a receipt showing the reason for the payment.

In the event that a Facilitation Payment is requested and there is a situation of danger to the personal safety of BMC employees or other persons carrying out activities on behalf of BMC, a danger to BMC property, or any situation that creates suspicion, concern or doubt regarding a payment, you must immediately inform the Executive Board

6. Gifts, hospitality, entertainment and travel expenses

This section sets out BMC's policy on the giving and receiving of gifts, hospitality and entertainment. The following guidelines are intended to minimise the risk that a gift or act of hospitality may be construed as a form of bribery.

Any gifts, acts of hospitality, entertainment and travel expenses must comply with the guidelines outlined in the following paragraphs.

6.1 Public Officials

This Code prohibits any giving of gifts, hospitality and business entertainment to public officials.

6.2 Distribution of gifts to private individuals

For the purposes of this Code, a free gift is to be understood as any object with monetary or economic value, such as a bottle of wine or a ticket for a sporting and/or socio-cultural event at which the bidder/host is not present.

It is permitted to offer or accept gifts of modest value. For the purposes of this Code, **a gift shall be considered of modest value if its nominal value including taxes) does not exceed EUR 50¹ or an equivalent amount in foreign currency per person** and it is customary to give or receive such a gift in the ordinary course of business. Examples of permissible gifts include calendars and diaries, as well as bottles of wine or spirits at Christmas or Easter or for other holidays. It is not permissible to attempt to divide a gift into several parts with the aim of reducing its economic value (e.g. a case of wine) and thus bring it within the value limit.

If the gift offered or about to be received does not fall within the cases listed above, it will be necessary to refrain from offering the gift or to refuse politely but firmly. In the event that accepting or giving the gift would reasonably appear to be in the best interests of BMC (for example, if the refusal could be considered offensive), prior written consent must be obtained from the Executive Board before accepting or giving the gift, by completing the "Gift, hospitality, entertainment received form" or the "Gift, hospitality, entertainment given form" attached to this Code in Annexes 2 and 3.

¹ Or any other value established by the sources of written law in force in the countries in which BMC operates through its Subsidiaries.

Such consent is also required if it is intended to offer a gift that exceeds the monetary limits per person set out above.

Consent shall only be given if the Executive Board considers that the gift cannot be construed as an act of inducement. In such circumstances, the gift must be acknowledged in the name of BMC and noted in the relevant Gifts, Hospitality, Entertainment Register.

When a gift that does not fall within the above-mentioned limits per person is approved, the authorising Directorate-General must send the relevant forms to the person responsible for maintaining the relevant register (as mentioned in Section 6.4).

Under no circumstances (and the Executive Board will not grant authorisation) is it permitted to give or accept cash gifts or equivalent means (e.g. gift vouchers), regardless of value.

Gifts offered to one's own family and friends by third parties, or that they may receive, must always be refused, regardless of value. Similarly, it is strictly forbidden to offer gifts to friends and family members of any Third Party during one's assignment or performance of activities on behalf of BMC.

6.3 Hospitality and entertainment

Within the scope of this Code, the terms hospitality and entertainment are to be understood as participation in an event at which the host is present. The Code applies whether BMC is the host or the guest. In the event that the host is not present, attendance at an event will be considered a free gift.

It is permitted to give or accept corporate hospitality of modest value. For the purposes of this Code, **entertainment or hospitality will be considered to be of modest value if the face value (including tax) does not exceed EUR 75 or an equivalent amount in foreign currency per person** and it is customary to offer or receive such hospitality in the ordinary course of business. By way of example, permitted forms of hospitality and entertainment include restaurant dinners or tickets to a sporting event, theatre performance or concert with a value not exceeding €75 per person or an equivalent amount in foreign currency. It should be noted that the **nominal value (including taxes) of 75 euros or an equivalent amount in foreign currency per person** refers to the hospitality in its entirety (context) and therefore it is not allowed to split a hospitality/event into several parts (e.g. splitting the aperitif from the dinner and/or the invitation to a sporting event if these events are held within the same context and for the same

subject) with the aim of reducing its economic value and thus bringing it within the limit value.

You may offer or accept entertainment or hospitality with a value of more than €75 per person (or equivalent amount in local currency) where such action is in the interests of BMC. However, prior written approval must be obtained from the Executive Board (by completing the "Gift and Hospitality Received Form" or "Gift and Hospitality Giving Form" attached to this code in Appendices 2 and 3) and the benefit will then be entered in the Gift and Hospitality Register. Consent will only be given if the Executive Board considers that the Gift or Hospitality cannot be construed as an act of inducement.

When an act of hospitality/entertainment is approved that does not fall within the above-mentioned limit, the Directorate General granting the authorisation must send the appropriate forms to the person responsible for keeping the relevant register (as indicated in Section 6.4).

Hospitality or entertainment to family and friends by third parties must always be refused, regardless of value. It is also strictly forbidden to offer gifts to friends and family members of any third party during their assignment or the performance of activities on behalf of BMC.

6.4 Gifts and hospitality register

All gifts and/or acts of hospitality not properly considered acceptable under this Code shall be recorded in the following registers:

- **Register of gifts, hospitality, entertainment received by BMC S.r.l.**, kept and duly updated by the Control and Finance Dept./ Administration Dept;
- **Register of gifts, hospitality, entertainment bestowed by BMC S.r.l.**, kept and duly updated by the Control and Finance Dept./ Administration Dept.

The above-mentioned functions are required to examine these Records on a quarterly basis and to inform the BMC S.r.l. Supervisory Board of their contents at least twice a year (or more frequently upon request).

The BMC S.r.l. Supervisory Board (in the person of the Chairman of the Board) reports twice a year to the BMC Board of Directors

S.r.l. on cases of corruption that could be detected pursuant to the Code, as part of the Report that the Supervisory Board periodically submits to the Board of Directors or when such events occur.

6.5 Business trips

All business trips for Employees and Third Parties must be authorised in advance by the Executive Board.

6.6 Further guidance on gifts and acts of hospitality

Further guidance on gifts and acts of hospitality can be found in the BMC checklist of permissible and impermissible behaviour regarding gifts and acts of hospitality included in **Annex 1**.

7. Financing of political parties

No payments to political parties² or their representatives are permitted.

² A political party is an association of persons who share a common political purpose or a common view on fundamental issues of state and social management or even just on specific and particular topics. The activity of the political party is aimed at working for the national interest, is carried out in space of public life, participating in the government thereof, and, in today's representative democracies, has as its 'prevailing sphere' the electoral sphere.

8. Donations to charitable organisations

Donations to charitable organisations are permitted as long as they are not made for the purpose of obtaining a personal, financial or political advantage for any Public Official or any client/supplier/third party (or their respective families). Donations must not be made for the purpose inappropriately influencing the beneficiary or in exchange for any commercial advantage and must comply with the following principles:

- it must be indicated whether or not they are in line with the approved annual budget;
- Beneficiaries may only include charities and non-profit organisations, established and registered in accordance with applicable law. Individuals may in no way be beneficiaries of a donation;
- all donations must be traceable and properly and accurately documented in writing;
- the beneficiary (entity/association/organisation receiving the donation) must be a reputable charity with a good reputation.

9. Third Parties and Due Diligence

BMC may be held liable for "indirect" payments made or offered to any entity or person by a Third Party on its behalf. When working with third parties, adequate due diligence regarding their background and reputation and the identification of any potential corruption risks are essential.

According to BMC, the following areas in particular require due diligence and risk assessment before embarking on any collaboration, transaction or project (and, more specifically, relations with third parties, certain types of joint ventures, company acquisitions, etc.):

- assessment of the risk of fraud, bribery and corruption associated with the country in which the activity will be conducted;
- analysis of potential business partners of Third Parties; and
- analysis of the proposed project or transaction in order to identify, as far as possible, the risk of corruption or bribery.

In the context of cooperation with Third Parties, the **Red Flags** to watch out for as indicators of potential violations of anti-corruption laws include

- the recommendation to BMC by a Public Official to employ a specific Third Party;
- the request to BMC by a Third Party to hire someone avoiding internal personnel selection procedures;
- the proposed remuneration for a third employee of BMC is exaggeratedly high compared to market rates without reasonable justification;
- a request made to BMC by a Third Party collaborator to make payments: in a country or geographic area other than the place of its residence or place of business or in a tax haven; to an unknown Third Party; to spread payments over several accounts; to make the payment to an account in a country other than the Third Party's place of residence or the place where the activity will be carried out; any other unusual financial request;
- a third party that BMC seeks to use as a collaborator does not have sufficient qualifications or the necessary staff to perform the required services;

- a Third Party relies heavily on its political or institutional contacts rather than on its technical expertise or time spent on the assigned task;
- upon examination of the references provided, the Third Party appears not to enjoy a good reputation or to be insufficiently well-known in the sector;
- a Third Party that BMC would like to use as a collaborator does not intend to accept the terms and conditions relating to compliance with anti-bribery legislation;
- a country in which BMC operates or is about to operate is known to be high risk area for corruption;
- the same Third Party is repeatedly used as a collaborator without any reasonable justification for such repeated assignments;
- a Third Party insists on collecting a commission or a fee before committing to enter into a contract with the Company or to perform a governmental task or procedure for Company;
- a Third Party asks to be paid in cash and/or refuses to sign a formal order or provide an invoice or receipt for payment;
- a Third Party demands substantial gifts and entertainment before entering into or continuing contractual negotiations or providing any services;
- a Third Party demands that payment be made in such a way as to "ignore" potential violations of the law;
- a Third Party asks to employ a friend or family member or secure an advantage for them;
- an invoice from a Third Party does not have a standard or otherwise usual format;
- a Third Party insists on using *side letters* or refuses to put the agreed terms in writing;
- the charging of a commission or fee on the invoice appears to be large or disproportionate to the service rendered;
- the request or demand by a Third Party to use an agent, intermediary, consultant, distributor or supplier not usually used by the Company or unknown to it;
- the offer by a Third Party of an improperly large gift or lavish hospitality.

It should be noted that the above list is not to be considered exhaustive and that other circumstances may also be indicative of potential breaches of corruption law. Should any doubts arise as to the legitimacy of a potential Third Party, reservations in this regard must be shared between the Executive Board and HR Dept./Human Resources before entering into any type of agreement with that Third Party.

10. Books of accounts, company records and internal control requirements

As required by law, BMC's business records must be accurate and reliable. All business records, including expense reports, accounting schedules, performance records, activity and production reports, and reports to auditors and public bodies, must be prepared in accordance with the principles of diligence and honesty. BMC's business records shall not for any reason present false or misleading information. No funds or assets of BMC may be allocated that have not been declared or recorded. Compliance with generally accepted accounting principles and established internal controls shall be required at all times.

All payments and other activities must be supported by an invoice and a contract or order that contains sufficient detail to describe the goods and/or services provided and is in line with BMC's internal procedures. All payments must also be properly recorded in the books, records and statements of accounts, in reasonable time and with sufficient detail. False, misleading, inaccurate, or fabricated information in BMC's books, records, and statements is strictly prohibited.

Expenses must not be concealed or deliberately misclassified in order to permit illegal payments. All payments made or received by BMC shall be properly recorded in books and records of BMC. All financial transactions must be authorised by the bodies in charge according to the internal control procedures. In no way may funds be created that are not declared or recorded.

11. Duty to report breaches of anti-corruption provisions

BMC requires its Employees Third Parties to operate with constant honesty and integrity. BMC shall not tolerate in any way the involvement of its employees or third parties in acts of corruption of any kind.

Employees or Third Parties are required to report to the Supervisory Board and/or to the manager of the internal Wistleblowing channel any case that violates this Anti-Bribery Code in accordance with the provisions of paragraph 4.10 Reporting Irregularities in the General Section of the OMC.

All reported cases of actual or suspected corruption will be promptly investigated and handled in the most appropriate manner. Each report will be treated confidentially, in a manner that preserves the legitimate personal interests of the person making the report.

12. Consequences for violating anti-corruption rules

Consequences for natural persons: measures for violation of anti-corruption laws by natural persons include imprisonment, disqualification from the office of director, auditor, liquidator, general manager and manager in charge of drafting corporate accounting documents, as well as from any other office with power of representation of the legal person or entrepreneur (accessory penalties ope legis in case of conviction to imprisonment of not less than six months for crimes committed with abuse of powers or violation of duties inherent to office). Disciplinary actions, including dismissal from the position held within BMC, are also provided for each violation of this Code.

Consequences for BMC: **Consequences** for BMC include financial penalties, damage to BMC's corporate brand and reputation, loss of the ability to conduct business in certain jurisdictions, prohibition to participate in public tenders, loss of business, legal action by competitors, litigation and substantial legal costs.

Some anti-corruption laws also provide that BMC directors and managers can be held personally liable for violations committed by employees or third parties, incurring high fines and/or imprisonment.

13. Application and regulatory discipline

BMC treats acts of bribery extremely seriously and will investigate any allegations of bribery, taking disciplinary and/or legal action in any case it is deemed appropriate. A violation of this Code may result in disciplinary action against an Employee, including dismissal. BMC shall have no further dealings with third parties who have violated this Code.

If reports are made to the police or other appropriate authorities, BMC will endeavour to cooperate in any way possible with investigations that could lead to legal proceedings against Employees and Third Parties.

14. Information and dissemination of anti-corruption regulations

All employees must be aware of the forms of corruption and bribery, the risks of engaging in such activities, the BMC Anti-Corruption Code, and how to report suspected corruption and bribery.

BMC shall promote awareness of the contents of this Code. Should an Employee or Third Party require further clarification to fully understand the Code, BMC shall provide appropriate support upon request.

15. Responsibility

The following functions have specific responsibilities for the application of the Code, as illustrated below:

Admin., control and finance Dept;	Keep and update the Register of gifts and hospitality received by BMC S.r.l. Report to the Supervisory Board of BMC S.r.l.
Admin., control and finance Dept;	Keep and update the Register of Gifts and Hospitality given by BMC S.r.l. Report to the Supervisory Board of BMC S.r.l.
General Management/	Examine the questions raised by employees on the following: <ul style="list-style-type: none"> - Facilitation Payments; - Third Party Due Diligence; - gifts, acts of hospitality and entertainment to or from the Company in excess of the economic limits set out in clauses 6.2 and 6.3 of this Code; and where appropriate, authorise the giving or receiving of exceptional gifts and/or acts of hospitality, complete the relevant forms and submit them to the subject in charge of updating the registers
General Management	Provide assistance and support to employees with regard to the enforcement mechanism of the Code.
Organism S upervisory Board of BMC S.r.l..	Review and analyse possible violations of this Anti-Corruption Code. Receive and analyse reports on the contents of the Registers. Report to the Board of Directors of BMC S.r.l. at least twice a year.

It shall be the responsibility of the Legal Department/General Secretariat of BMC S.r.l. to review this Code as necessary (and in any case at least every two years) in order to ensure its continued compliance with relevant anti-corruption laws.

16. Questions and information

If you wish to raise a question concerning the requirements contained in this Code, or if you suspect current or past instances of bribery or corruption, you must notify the Executive Board immediately.

ANNEX 1

Gifts, hospitality and entertainment



As a matter of principle, there is nothing improper about offering gifts and acts of hospitality with the genuine intention of developing relationships. Occasional, modest gifts and entertainment are a legitimate means of fostering good relations between BMC and third parties and are therefore permitted.



If gifts or hospitality/entertainments of negligible value and in line with normal business practice are offered, they may be accepted.



It is forbidden to offer or receive gifts or hospitality/entertainment that could influence or be perceived to influence the decision-making processes regarding the outcome of BMC transactions or negotiations or to win or secure new business.



Do not offer or accept gifts or acts of hospitality if you believe that they may impair objective judgement, inappropriately influence a decision or create a sense of obligation, or if there is a risk that they may be misunderstood or misinterpreted by others, e.g. large gifts and entertainment expenses.



It is not permitted to offer third parties or accept gifts or entertainment expenses from them in the course of negotiations concerning a tender or contract with such third parties, regardless of the value of such gifts and entertainment expenses.



It is appropriate to ask: "Is this excessive? Is it a tribute or rather an act of bribery? Is it an act of hospitality or rather an attempt at persuasion? Am I trying to influence someone to do something inappropriately or am I being influenced by someone?" If it is difficult to justify such acts, it is probably not a correct action.

Giveaways



It is permitted to offer or accept gifts of negligible value, i.e. not exceeding EUR 50 or the corresponding amount in local currency, if it is customary to offer or receive such gifts in the normal course of business.



Examples of acceptable gifts include ballpoint pens, calendars or diaries.



Other gifts may also be accepted when their value exceeds EUR 50 or the corresponding amount in the local currency, if this is done on behalf of BMC and the prior written consent of the Executive Board is obtained, and the gift is then recorded in the respective gift and hospitality register. At the discretion of the manager, such gifts may then be transferred, distributed or donated to charity.



A useful question to ask when accepting or receiving free gifts may be: Would I be comfortable making my supervisor aware of the free gift?



Gifts of non-negligible value may not be offered unless you have the prior written consent of your direct supervisor.



Examples of gifts that should not be accepted without such consent include sumptuous baskets, cases of champagne, tablets or any other object delivered to one's private address.



It is not permitted to try to divide a gift into several parts with the aim of reducing its economic value (e.g. a case of wine) and thus bring it within the limit value.



It is not permitted to repeatedly offer gifts to or accept gifts from the same third parties.



Under no circumstances may money, whatever the amount, be offered or accepted. High-value cash equivalents such as gift certificates or travel vouchers must not be offered or accepted.



Holidays will always be assessed as exceeding a negligible value and can neither be offered nor accepted.



Gifts offered to one's family and friends by third parties must be refused under any circumstances, regardless of value.



Similarly, it is strictly forbidden to offer gifts to friends and family members of any third parties in the course of one's own assignment or the performance of activities on behalf of BMC. Such gifts could in fact be interpreted as an inducement to win or secure an assignment.

Hospitality and Entertainment



It is permissible to offer or accept acts of corporate hospitality where their economic value (including taxes) does not exceed 75 euros per person or the corresponding amount in local currency and where it is customary to offer or receive such forms of hospitality in the usual course of business.



Examples of acceptable hospitality and entertainment expenses include dinners at restaurants, tickets to sporting events, theatre performances or concerts in the presence of the host.



A useful question to ask in relation to corporate hospitality may be: is it reasonable, proportionate, not excessive? Would BMC be willing reciprocate?



Particular care must be taken with substantial offers concerning social functions, travel or overnight stays such as tickets to sporting events or representation expenses abroad.



You may offer or accept entertainment in excess of EUR 75 per person or the corresponding amount in local currency if this is in the interest of BMC, you have the prior written consent of your Line Manager and provided that such entertainment expenses are then recorded in the relevant Gifts and Hospitality Register.



You may not offer entertainment or acts of hospitality that do not fall under the category "reasonable and appropriate" unless you have the prior written consent of your Line Manager.



It is prohibited to repeatedly offer the same third parties or to repeatedly accept from them meals, tickets or invitations to sporting, cultural or social events.



It is also forbidden to accept tickets for sports or cultural events at which the host is not present.



If entertainment or an act of hospitality is offered that does not fall within these guidelines, it must be refused in a courteous but firm manner. If you feel that a refusal of entertainment or an act of hospitality could be construed as an offence, you must seek the prior written consent of your Line Manager.



Acts of hospitality or entertainment offered to one's family or friends by third parties must be refused in all cases, regardless of value.



Similarly, it is strictly forbidden to offer acts of hospitality to friends or family members of any Third Party in the course of one's assignment or performance of activities on behalf of BMC. Such acts of hospitality could be interpreted as inducement to win or secure business.

Public Officials



It is forbidden under any circumstances to offer gifts, acts of hospitality and entertainment expenses to a Public Official, regardless of their value.



Similarly, any facilitation payment (amount donated to a public official to expedite routine governmental procedures such as visa issuance) is prohibited.



It is prohibited to pay the expenses of a public official, including those for business trips.



Donations to political parties on behalf of BMC and for the benefit of any public official are not permitted. No donations may be made for the purpose of inappropriately influencing the recipient or in exchange for a commercial advantage. Donations must comply with the principles set out in paragraph 8 of this Code.

ANNEX 2

FREE GIFTS AND HOSPITALITY/ENTERTAINMENT FORM

Name of Employee (Bidder)	
Office	
Name of Beneficiary and Organisation Name	
Position of Beneficiary	
Partner commercial new or existing	
Number of times a Gift or Hospitality/Entertainment was offered to this business partner in the last 12 months	
Public official (yes/no)	
Description of the Gift or Act of Hospitality/ entertainment provided	
Date of offer of gift or act of Hospitality/Entertainment	
Value of the Gift or Act of Hospitality/Entertainment bestowed	
Reason for Giving Gifts or Hospitality/Entertainment	

Attestation of value of the Gift and/or Hospitality/Entertainment attached (yes/no)	
In the case of Hospitality/Entertainment, the tenderer will be present to the event?	
Signature	
Date	

For official use only

Authorised by	
Signature	
Date	
Rejected by	
Signature	
Date	

ANNEX 3

FORM GIFTS AND HOSPITALITY/ENTERTAINMENT RECEIVED

Name of Employee (Receiver)	
Office	
Name of the Offeror and Organisation Name	
Position of the Offeror	
Partner commercial new or existing	
Number of times you received a Gift or Hospitality/Entertainment from this partner commercial in recent 12 months	
Public official (yes/no)	
Description of the Gift or Act of Hospitality/Entertainment received	
Date of receipt of gift or deed of Hospitality/Entertainment	
Value of the Gift or Act of Hospitality/Entertainment received	
Reason for receiving Gifts or Hospitality/Entertainment	

Attestation of value of the Gift and/or Hospitality/Entertainment attached (yes/no)	
In the case of Hospitality/Entertainment, the tenderer will be present to the event?	
Signature	
Date	

For official use only

Authorised by	
Signature	
Date	
Rejected by	
Signature	
Date	