

weavenn

GIFTS & BENEFITS CHARTER

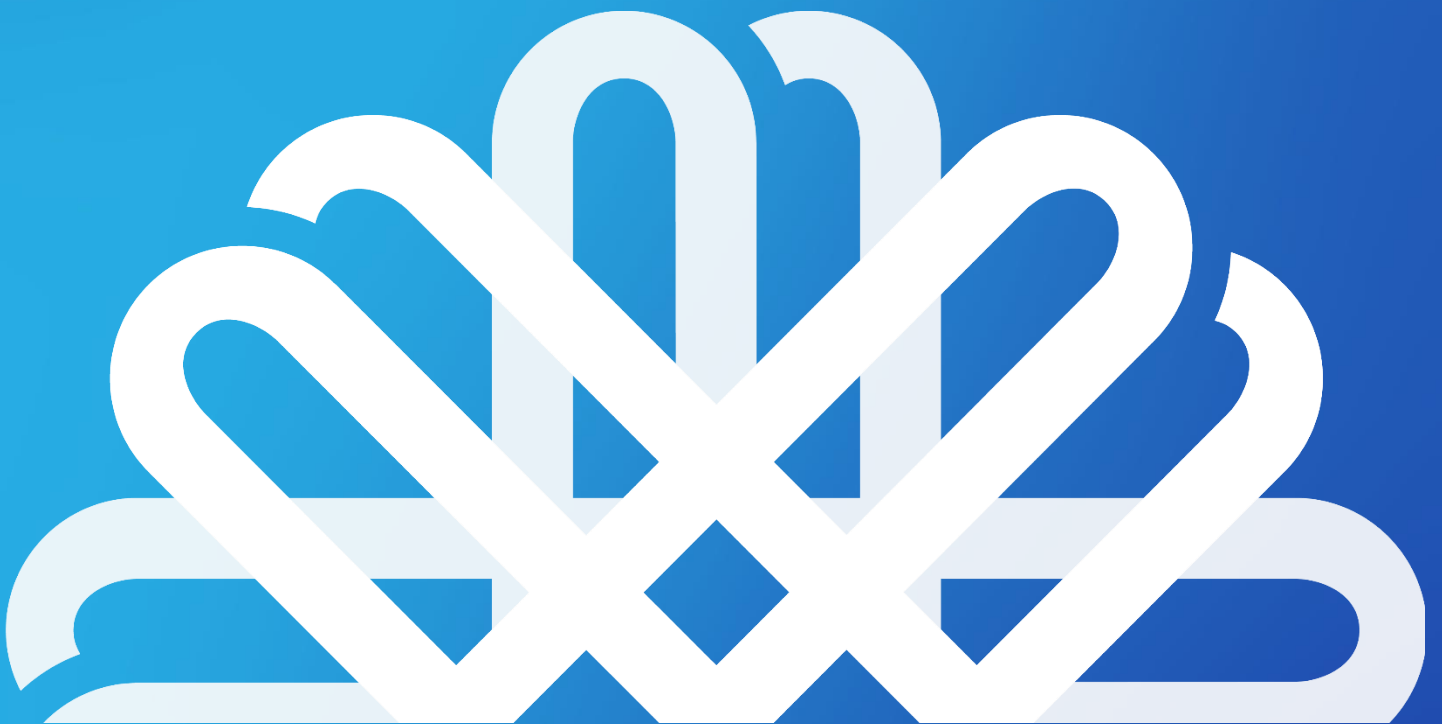


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Benefits from suppliers, partners, service providers or third parties

The acceptance, by a staff member of Weavenn, of benefits for any purpose or in any form (cash, cheques, various advantages, etc.) is strictly prohibited.

What should be done if the situation arises?

- ☑ The benefit offered must be brought to the attention of the employee's line management.
- ☑ A standard letter of negative response, drafted according to the model in Annex 1 should be addressed to the company that proposed it.

Gifts

- ☑ LOW-VALUE "ADVERTISING" GIFTS:
 - Advertising objects (calendars, diaries, gadgets) of low value that bear the company name or logo of the supplier or partner in a very visible way may be kept by the employee.
- ☑ GIFT WORTH LESS THAN €100 AND NOT RECURRING*:
 - The gift may be accepted by the employee. However, they must inform their line manager.
- ☑ GIFT WORTH LESS THAN €100 AND RECURRING*:
 - The employee must decline the gift.
 - An email or letter of refusal, drawn up according to the model presented in **Annex 1**, must be sent to the supplier.
- ☑ GIFT WORTH MORE THAN €100 AND RECURRING* OR ONE-OFF:
 - The employee must decline the gift.
 - An email or letter of refusal, drawn up according to the model presented in **Annex 1**, must be sent to the supplier.

** A recurring gift is a gift received more than once from the same third party, by the same individual, over a period of 12 months.*

If you are in doubt about the value of the product offered and whether or not you should keep the gift, speak to your line manager.

Annex 2 gives examples of the types of gifts that should not be accepted, regardless of their value or frequency.

Business meals

Meals that form part of the usual work meetings, and that are not of an ambiguous nature due to their presumed cost or frequency, are authorised subject to prior notification of the employee's line manager.

It is up to the hierarchy to avoid abuses in this area.

If you have any doubts, refer to the decision tree in **Annex 4**.

Travel and seminars

Travel that is not primarily devoted to business or technical meetings or visits is not permitted. The same applies to events that do not have a clear and concrete link with the company's activity.

A standard letter with a negative response drafted according to the template in **Annex 1** must be sent to the company.

All trips and/or seminars must be authorised by the employee's superior.

EXEMPLE:

A supplier or potential supplier invites me to spend three days at a trade show. All expenses are covered (travel, entrance to the trade show, accommodation, meals as well as participation in a cultural event).

What should I do?

With the agreement of your hierarchy, you can agree to go to the trade show and, in the context of good relations, allow yourself to be invited to a meal or a cultural event on this occasion, provided that this remains a very occasional occurrence with the supplier concerned and that it takes place outside the critical phase (negotiations in progress, for example).

However, transport costs and accommodation must be paid for by Weavenn.

If you have any doubts, refer to the decision tree in **Annex 4**.

Direct purchases from suppliers

Direct purchase from a supplier is prohibited.

The exceptions

Gifts

Gifts with a value of less than €100, which are not recurring and are not included in the list of prohibited gifts (**Annex 2**) may be accepted by an employee, but the employee must inform their line manager;

Gifts with a value of less than €100, whether recurring or not, included in the list of prohibited gifts (**Annex 2**) as well as all gifts with a value of more than €100 must be declined.

- ☑ Letter of refusal (**Annex 1**) to be sent to the supplier.

Business meals

The meal is permitted if:

- ☑ It takes place in the context of normal work meetings;
- ☑ It is not ambiguous because of the presumed cost or frequency;
- ☑ The employee has referred to the decision tree (**Annex 4**) before acceptance;
- ☑ The employee informs their line manager before acceptance.

Travel and seminars

Travel and events are permitted if:

- ☑ They are essentially devoted to meetings or visits of a business or technical nature;
- ☑ They are clearly and concretely related to the Group's activity;
- ☑ The employee has referred to the decision tree (**Annex 4**) before acceptance;
- ☑ The employee informs their line manager before acceptance.

Annexes

Annex 1: Rejection letter

"Dear Sir/Madam, I have received your gift, invitation (benefit offered to be specified) and I would like to thank you very much. Although I am very appreciative of this gesture, it is unfortunately not possible for me to accept this invitation, which is contrary to the Gifts & Benefits Charter in force within Weavenn. I am sure you will understand, and I would like to thank you for your understanding."

Annex 2: Non-exhaustive list of prohibited gifts regardless of the value or the frequency

- ☑ Gifts governed by conditions or solicitations
- ☑ Offensive or inappropriate gifts
- ☑ Gifts in the form of services (promise of employment, etc.)
- ☑ Services provided by a third party free of charge or below market prices
- ☑ Excessive or luxurious gifts (electronic equipment, jewellery, etc.)
- ☑ Frequent gifts despite their low values
- ☑ Gifts for which the value could not be revealed without embarrassing the person

Annex 3: Summary of the group's gifts and benefits policy

The acceptance of benefits, whatever their purpose or form (cash, cheques, various benefits, etc.) is strictly prohibited, save in exceptional cases (see below).

WHAT SHOULD I DO IF I RECEIVE A BENEFIT THAT DOES NOT COMPLY WITH THE POLICY OF THE GROUP?

- ☑ My line management must be informed
- ☑ A refusal letter must be sent to the supplier (Annex 1)

Annex 4: Decision tree for gifts, business meals, travel and seminars as well as cultural or sporting events

