

1. Description

AAH PLASTICS is committed to undertake business fairly with honesty and transparency. This commitment must be reflected in every aspect of our business conduct, including the offering and acceptance of gifts and hospitality (G&H). This Policy provides guidance on what is and is not acceptable for G&H offered and received by AAH PLASTICS Personnel. It applies to all employees together with others acting for or on behalf of AAH PLASTICS.

Providing G&H is a way of building and maintaining good business relationships. However, offering or accepting excessive G&H may increase the risk of actual or perceived bribery and corruption. AAH PLASTICS has zero tolerance for acts of bribery and corruption.

This Policy aims to set the spirit of what is allowable. It is not possible to give an exhaustive list of every possible scenario. AAH PLASTICS expects a common-sense, practical approach to be adopted in interpreting this Policy. When following the guidance in this Policy, always consider: “Would I be comfortable offering or accepting the G&H if it came to the attention of AAH PLASTICS management or the general public?”

2.Statement

AAH PLASTICS Personnel may:

- Offer or accept gifts that are occasional, with a market value that does not exceed 50 €.;
- Offer or accept hospitality that is occasional, business-related, modest in value and appropriate in all the circumstances.

All AAH PLASTICS Personnel must:

- Record all G&H given or received on the G&H Register on HR department.
- Make sure that both AAH PLASTICS and the inviting/invited parties are present for the duration of hospitality events;
- Carefully consider whether the recipient is involved in any decision making that could be, or perceived to be, inappropriately influenced by the G&H being offered;
- Exercise extra caution when G&H are offered by a supplier during a tender process, or if AAH PLASTICS are offering G&H while tendering for business;
- Obtain approval before offering G&H to Public Officials. A Public Official is anyone elected or appointed to a position of official administrative, judicial or legislative public authority.

AAH PLASTICS Personnel must not:

- Offer or accept G&H if there is any suggestion or expectation that the recipient will do something in return;
- Offer or accept G&H if it could be perceived as creating a conflict of interests.

3. Examples of prohibited gifts and hospitality

AAH PLASTICS Personnel must not accept or offer:

- Anything that could be perceived as intended to influence a specific business decision;
- Gifts with a market value of more than 50 euro
- Gifts of cash or cash equivalents (including loans, gift vouchers, mementos or souvenirs in the form of currency, etc.);
- Entry to adult entertainment clubs or other inappropriate events or locations;
- Tickets for an event where the inviting party does not attend.

AAH PLASTICS Personnel must not accept discounts made available to an individual that are not available to AAH PLASTICS Personnel generally.

4. Out of Policy Gifts & Hospitality

If you are offered any G&H that is not in keeping with the letter or spirit of this Policy then you should politely reject it, explaining that accepting it would be against AAH PLASTICS Gifts and Hospitality policy.

In exceptional circumstances, if it is not possible to reject the offer, you should consult with HR department as soon as possible.

Dealing With Policy Breaches

Any breach of this Policy will be regarded as a serious matter and is likely to result in disciplinary action including potential dismissal.

5. Deployment

Management of AAH PLASTICS are responsible for implementing this Policy in their areas of responsibility.
