

Directive

7.09 Anti-Bribery, Gifts and Entertainment			
Source Document		Code of Conduct	
Content Owner		AkzoNobel Legal Group (ALG)	
Signed off by	Date	Executive Committee	July 17, 2014
Effective Date		August 25, 2014	
Purpose			
<p>The purpose of this Directive is: i) to ensure compliance with the United States Foreign Corrupt Practices Act, the United Kingdom Bribery Act 2010, and other applicable anti-bribery and anti-corruption laws and in other jurisdictions where AkzoNobel does business; and ii) to establish minimum standards regarding the acceptable giving and receiving of gifts and entertainment.</p>			
Scope and definitions			
<p>This Directive applies to AkzoNobel's businesses, management and employees.</p> <p>"Representative" means an individual or entity authorized to act on behalf of AkzoNobel. Definitions of "bribery", "facilitation payments", "gifts", and "entertainment" are provided in the related Rules.</p>			
Directives			
<ol style="list-style-type: none"> 1. Management is responsible for compliance with all applicable anti-bribery and anti-corruption laws, as well as the Rules and Anti-Bribery Compliance Manual 2. Employees and representatives shall not pay, offer to pay, or accept bribes 3. Employees and representatives shall not make facilitation payments, including in countries where facilitation payments may be legal or commonplace 4. Employees and representatives may give or receive gifts provided they do not exceed €100 in value and are appropriate to the business relationship in question 5. Employees and representatives may host or receive entertainment provided it is appropriate, reasonable and proportionate, and has been approved by responsible management in accordance with the Rules 6. Employees and representatives may not offer or accept travel or hotel arrangements associated with entertainment 7. AkzoNobel may not directly or indirectly make any payments or donations to political parties or their institutions, agencies or representatives 8. Charitable donations and sponsorships must be carefully considered to ensure compliance with this Directive and the Rules 9. Business unit, Functional and country management shall select and manage their relationships with representatives in the manner described in the Anti-Bribery Compliance Manual 			
Related documents			
7.09.1 Rules on Anti-Bribery, Gifts and Entertainment			
Anti-Bribery Compliance Manual			