

# Facilitating Payments

## Purpose

At AkzoNobel, we don't promise, offer, give, or authorize anything of value, directly or through others, with the intent to improperly influence or reward a business decision. We each have a responsibility to make decisions in the company's best interest and to ensure that we base our dealings with business partners on objective decisions.

These rules must be followed to ensure that we conduct business fairly, transparently, with integrity and in compliance with applicable laws and regulations as well as AkzoNobel's core values and standards. In case of conflict, the most stringent standard applies.

## 1 What are Facilitating Payments?

- a. Facilitating Payments are unlawful or questionable payments to [1] Government Official that are used to facilitate, expedite or secure the performance of routine government services or activities which AkzoNobel is otherwise entitled to receive. These payments are prohibited and should not be made directly to a [1] Government Official or indirectly via a third party.
- b. Facilitating Payments do not include official and documented fees or payments built in a formal or official government process to obtain expedited, priority or emergency services, passports, visas or other government required travel documentation for employee use.

### 1.1 Prohibition of Facilitating Payments

We do not give or authorize Facilitating Payments.

### 1.2 What is a Personal Safety Payment?

- a. Personal Safety Payments are payments made in extraordinary circumstances where we are left with no alternative but to make payments to protect life, liberty, ensure the health and safety or avoid physical harm of an individual.
- b. We may accept or authorize a Personal Safety Payment if there is no other reasonable alternative to protect life, liberty, ensure the health & safety or avoid physical harm of an individual.

## 2 Definitions

[1] “Government Officials” are:

- an officer or employee of any government, department, agency, bureau, authority, or state-owned or state-controlled entity;
- acting in an official capacity for or on behalf of any government, department, agency, bureau, authority, or state-owned or state-controlled entity;
- an official, employee, or person acting on behalf of a government-sponsored or public international organization such as the European Union, the United Nations or the World Bank;
- holding a legislative, administrative, executive, or judicial position, whether appointed or elected; a political candidate, or
- an officer or employee of a political party; a member of a royal family; or a family member of, or otherwise closely associated (whether family or personal), with any of the foregoing.

[2] “Relatives” are any family member (whether through blood, adoptive/foster or other legally recognized relationships) such as spouse, domestic partner, parent, grandparent, child, grandchild, sibling, in-law, aunt, uncle, niece, nephew, cousin, step-relatives; others residing in your household.