

Hospitality

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 and are not influenced by Hospitality Events.

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 Hospitality Events?

- a. Hospitality Events are all events and other hospitality that are at least partially hosted by AkzoNobel and involve a representative of AkzoNobel.
- b. Hospitality Events do not include internal events organized exclusively to AkzoNobel employees and customer incentive programs.

2 Hospitality Events must have a reasonable business purpose

- a. We do not promise, offer, give or authorize a Hospitality Event, directly or through others, with the intent to improperly influence or reward a business decision.
- b. Hospitality Events must serve a reasonable business purpose for AkzoNobel.
- c. We offer Hospitality Events to the (wholesale) customer legal entity, represented by its general management or procurement management, not to individuals. The customer legal entity must be free to select its employees to participate in the Hospitality Event. We can specify the type of audience.
- d. We do not organize or offer Hospitality Events which are lavish, extravagant and/or excessive based on marketplace practices. All Hospitality Events given or received must be of modest value and appropriate to the business relationship.
 - We do not organize or offer Hospitality Events of an inappropriate nature which may risk AkzoNobel reputation.
 - We do not choose any inappropriate, extravagant, luxurious and/or leisure or touristic locations for the Hospitality Event.
- e. [\[1\] Relatives](#) of AkzoNobel employees do not attend Hospitality Events.
- f. We are not allowed to invite [\[1\] Relatives](#) of customer employees without following the Hospitality Procedures.

Hospitality

- g. We are not allowed to invite [\[2\] Government Officials](#) without following the Hospitality Procedures.
- h. We must not use our family or [\[1\] Relatives'](#) relationships, funds, or assets to circumvent these Hospitality Rules.

3 Definitions

[1] "Relatives" are any family member (whether through blood or adoptive/foster relationships or other legally recognized family like 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.

[2] "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.