

## Gifts Policy

At AkzoNobel, we don't promise, offer, give, authorize or receive 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 Gifts.

This Policy must be followed by all AkzoNobel employees and third parties working with, for or on behalf of AkzoNobel to ensure that we conduct business fairly, transparently and 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.

**Please Note:** These Rules & Procedures do not apply to:

- gifts to/between employees of AkzoNobel
- gifts/rewards under a Customer Incentive Program

Local Rules for local stricter rules deviating from corporate requirements

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### 1. Gifts Rules

#### 1.1. What is a Gift?

A gift is any item of value promised, offered, given, authorized, received without the expectation of payment or anything else in return.

#### 1.2. What we cannot offer or receive as Gifts

1. We do not promise, offer, give, authorize or receive a Gift, directly or through others, with the intent to improperly influence or reward a business decision.
2. We do not offer or receive a Gift of more than EUR 100. Despite the maximum value of EUR 100, we do not offer or receive Gifts, which are:
  - Cash or cash equivalents, irrespective of their value;
  - Not in accordance with Precious Articles Rules
  - Excessive based on marketplace practices;
  - Lavish or extravagant;
  - Not in accordance with local law;
  - Likely to risk the safety of people or AkzoNobel's reputation;
  - To/from Government Officials.

#### 1.3. Gifts to or from Relatives or personal relationships

We can offer or receive Gifts that are solely motivated by a family or personal relationship, subject to the Conflict of Interest Policy, and completely unrelated to, and disconnected from, any business activity. However, we must not use our Relatives or personal relationships, funds, or assets to circumvent these Gift Rules.

## **2. Gifts Procedures**

### **2.1. Get approval and register your gift in our Gift Pre-Approval and Registration Tool**

Before offering a Gift, or immediately after having received a Gift we must register and, if applicable get approval. Gifts – offered and received – must be registered through our internal processes.

### **2.2. Return the Gift if it is not according to our Rules**

If we receive a Gift that does not comply with the Gift or Precious Articles Policy, we follow the relevant internal processes.