

Directive

Dealing with invitations, gifts and potential conflicts of interest (Anti-corruption Directive)

What can I accept?

What may I turn to others?

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1. Scope of Application

This Directive applies to all employees of Von Roll Holding AG as well as all affiliates in which Von Roll AG holds a majority interest (hereinafter: "Von Roll Group Companies") (Von Roll Holding AG and Von Roll Group Companies hereinafter: "Von Roll").

The following internal company regulations always claim validity. The threshold values set out in this Directive are expressed in EUR. Outside the Eurozone, they must be converted into the respective national currency according to local purchasing power. Insofar as the country-specific legal regulations are stricter than those listed in this Directive, they shall apply.

2. Purpose

This Directive serves to avoid corrupt practices in connection with Von Roll's business partners and other third parties and also ensures transparency.

3. Document Owner

Compliance Officer

4. Directive

4.1 Dealing with invitations and gifts: What can I accept?

4.1.1 General Principles

Benefits between business partners are customary to a reasonable extent and legally accepted. However, they can also be interpreted as unfair influence. The same applies to the mixing of private interests with Von Roll's activities. There is a risk here of accusations of corruption, which would considerably impair Von Roll's integrity.

In order to avoid even the appearance of a lack of integrity, Von Roll employees are always **prohibited from demanding** gifts from third parties in the form of money, gifts in kind, invitations to dinner or other events in connection with their duties at Von Roll.

The **acceptance** of invitations and of **promises of being invited** (e.g. to events or a business dinner) for the purpose of maintaining business relations, for advertising purposes or certain occasions (birthdays, anniversaries) is permissible if the principle of appropriateness is observed. The benefit must be within the framework of generally accepted business practices, always keeping in mind the hierarchical position of donor and recipient as well as the individual occasion.

Such acceptance and promise must under no circumstances result in you, the recipient, making inadmissible decisions. If you have the impression that your counterpart wants to influence you, then refuse, even if you consider yourself "incorruptible". The mere impression of such influence

must be avoided. To help you making a decision in this case, you can ask yourself whether the benefit could damage Von Roll's reputation if it became public knowledge.

You are also prohibited from relocating to private life: If you are offered benefits at a private level, refuse to accept them if you or Von Roll and the other party also have professional connections. Note that private contacts to Von Roll business partners or companies that Von Roll wishes to engage are likely to compromise Von Roll's integrity. They must therefore be made transparent. If a conflict of interest threatens, such connections are prohibited. For this reason, the following principles apply:

- **Separation Principle:** Clear separation of benefits on the one hand and turnover transactions on the other.
- **Transparency and Approval Principle:** Disclosure of benefits from business partners.
- **Documentation Principle:** Written fixing of the acceptance of gifts and entertainment.
- **Principle of Equivalence:** The services and quid pro quo between Von Roll and its business customers are always in reasonable proportion to each other.

Von Roll strictly rejects transactions that are conducted in violation of laws and internal directives. If in doubt, please contact the Compliance Officer (e-mail: compliance@vonroll.com).

4.1.2 Potential Conflicts of Interest

All employees must avoid situations in which their personal or financial interests conflict with those of Von Roll. In particular, it is prohibited to invest in the companies of competitors, suppliers, customers or other contractual partners or to enter into private business relationships with them if this could lead to a conflict of interest. Such a conflict exists whenever the nature and extent of a participation or business relationship are such as to influence in any way actions taken in the course of Von Roll's business activities.

In such a case, investments in and business relationships with competitors, suppliers, customers, potential contractors or other contractual partners of Von Roll must be reported to the Compliance Officer immediately.

4.1.3 Gifts

It is always forbidden for Von Roll employees to accept cash.

Acceptance of gifts from business partners or other persons related to your work at Von Roll is permitted without documentation and approval if they are made as a courtesy or in accordance with customary practices, e.g. promotional gifts or "giveaways".

In this context, there may be individual situations in which even higher-priced gifts exceptionally still correspond to general business practices.

Example: A long-standing supplier will send you a bottle of champagne worth 100.00 EUR on the occasion of your 30th company anniversary.

Example: A good customer with whom Von Roll regularly generates six-figure sales gives you two bottles of red wine worth EUR 70.00 at Christmas.

Note that the mere appearance of influencing must be avoided. If you have the feeling that a gift is intended to achieve ("to buy") a certain behavior, reject it - regardless of its value.

Example: A long-standing supplier will send you a bottle of champagne worth 100.00 EUR. A contract award for a large project is imminent.

Example: A good customer with whom Von Roll regularly generates six-figure sales gives you two bottles of red wine worth EUR 70.00 at Christmas. You are currently negotiating the amount of future discounts on products supplied.

If you receive a gift that is more expensive and no longer has the character of a promotional gift or a "giveaway" - regardless of whether it is sent to your home or business address - the acceptance must be documented. Please use **Form No. 1** and forward it to the Compliance Officer.

If the gift that a Von Roll employee receives from a (potential) business partner - regardless of whether it is sent to the private or company address - has a value of more than EUR 200.00**, it may not be retained. If, in individual cases and taking into account socio-cultural circumstances, the rejection or return of the gift is inappropriate or impossible, it must be donated, raffled or divided among the workforce. In each individual case, the procedure must always be coordinated with the Compliance Officer. In addition, the process must be documented and the documentation forwarded to the Compliance Officer.

Value of gift per donor per year	Admissibility (internal rule)	Further action	Documentation
≤ EUR 40.00* (Low-value gifts, giveaways, promotional and small gifts (usually with company logo etc.))	Yes	Not applicable	Not applicable
> EUR 40.00* ≤ EUR 200.00* (higher priced gifts, no character of a promotional gift)	Yes, if it is not associated with the expectation of concrete consideration. The acceptance of the gift must be documented.	Forwarding the documentation to the Compliance Officer.	Internal Form No. 1
> EUR 200.00*	No**	Internal: Always coordinate the concrete procedure in the individual case with the Compliance Officer. Forwarding of documentation to the Compliance Officer.	Internal: Form No. 1

* The thresholds set out in this Directive are expressed in EUR. Outside the Eurozone they must be converted into the respective national currency according to local purchasing power. The thresholds refer to the total value of gifts received by a Von Roll employee from one donor in a calendar year.

** Members of the Executive Board are only required to provide documentation to the Compliance Officer.

4.1.4 Entertainment

If your business partner invites you to a meal, you may accept the invitation without permission if there is a direct business connection and the type and extent of the hospitality corresponds to the usual business practices.

Example: Supplier U supplies Von Roll at regular intervals with certain products that Von Roll needs to manufacture its products. Such products are offered by various companies. You are a member of the department that decides on the corresponding orders and purchasing. U first invites you to a presentation in his office, followed by a standing reception with finger food. Cost per person: approx. EUR 30.00.

Even hospitality invitations in which the business connection is not immediately obvious or in which the nature, extent or value of the hospitality does not correspond to customary business practices are not inadmissible from the outset. Invitations in the higher price segment may be appropriate in individual cases depending on the specific circumstances. Please document invitations in writing (**Form No. 1**) and forward the relevant form to the Compliance Officer.

Example: Supplier U supplies Von Roll at regular intervals with certain products that Von Roll needs to manufacture its products. Such products are offered by various companies. The contract was finally awarded to U. Because of the order

volume and the consistently good business relationship over many years, U invites you to the nearby Italian restaurant for dinner after the contract is signed. Cost per person: approx. EUR 70,00.

Also when it comes to hospitality invitations it is important to avoid the mere impression of influenceability. So if you have the feeling that such an invitation is intended to achieve (“to buy”) a certain behavior, reject it!

Value of entertainment per host per year	Admissibility (internal rule)	Further action	Documentation
≤ EUR 50.00* Hospitality related to direct business (snack, standing reception, finger food, business breakfast)	Yes	Not applicable	Not applicable
> EUR 50.00* ≤ EUR 200.00* Hospitality without directly obvious business connection	Yes, if it is appropriate in the individual case due to the concrete circumstances and is not connected with the expectation of a concrete consideration. The invitation must be documented.	Forwarding the documentation to the Compliance Officer	Internal Form No. 1
> EUR 200.00*	No**	Not applicable**	Not applicable

* The thresholds set out in this Directive are expressed in EUR. Outside the Eurozone they must be converted into the respective national currency according to local purchasing power. The thresholds refer to the total value of entertainment received by a Von Roll employee from one host in a calendar year.

** Members of the Executive Board are only required to provide documentation to the Compliance Officer.

4.1.5 Events

4.1.5.1 Specialist Events

If a business partner invites you to a trade event, you may accept the invitation without approval if the event has a direct business connection, such as attending a trade fair or attending a training course.

If other benefits are offered in addition to the event (e.g. participation in the supporting program), written documentation and forwarding of the relevant form (**Form No. 1**) to the Compliance Officer is required.

Example: Supplier U offers certain parts that Von Roll needs to manufacture its products. Other competitors of U also sell such parts. In the relevant department, you are responsible for deciding which company to purchase the required parts from. Coincidentally, a corresponding trade fair is currently taking place in Hamburg, where U is also presenting itself. U invites you to the fair to get you a first impression of his company. In the evening there will be a dinner at the hotel, followed by a visit to a musical. A city tour is scheduled for the next morning before the return journey to Augsburg takes place at noon.

Also to be documented with **Form No. 1** and forwarded to the Compliance Officer is the participation in specialist events, provided that the duration of the event exceeds one working day.

4.1.5.2 Other Business Related Events

If the invitation does not concern a purely specialist event, but refers to other events with a business reference, this must also be documented and the relevant form (Form No. 1) forwarded to the Compliance Officer.

Business events can be those in which the focus is on cultivating contacts and deepening personal business relationships or which serve as a communication platform.

This category includes, for example:

- Business Breakfast
- Invitations to industry or network meetings
- Invitations in connection with traditional events
- Invitations to traditional events
- In some circumstances also invitations to sports facilities

Example: Supplier U offers certain parts that Von Roll needs to manufacture its products. Other competitors of U also sell such parts. In the relevant department, you are responsible for deciding which company to purchase the required parts from. U invites you to the Oktoberfest in Munich.

The participation of spouses or life partners / other outside accompanying persons is generally not permitted. In exceptional cases and after consultation with the Executive Board, the participation of accompanying persons is possible. Please note that the value of the third party's invitation is attributed to you.

The entire process must be documented. Please use Form No. 1 for this purpose.

<p>Note: If the event is of a pure or predominant leisure nature, the acceptance of such an invitation will regularly be inadmissible.</p>
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Type of event	Admissibility of participation (internal rule)	Further action	Documentation
Specialist event with direct business reference, provided that the duration of the event is max. one working day without an overnight stay.	Yes	Not applicable	Not applicable
Specialized event with direct business reference, provided that the duration of the event is more than one working day.	Yes The invitation shall be documented.	Forwarding the documentation to the Compliance Officer	Internal Form 1
Technical event with a non-technical component (e.g. supporting program) as well as other business related events (business breakfast or similar)	Yes, as long as the non-technical part does not predominate. or in individual cases for appropriate occasions. The threshold values of the above table (table hospitality) shall be observed in each case and the assumption shall be documented.	Forwarding the documentation to the Compliance Officer	Internal Form No. 1
Other events with predominantly or purely recreational character	No*	Not applicable*	Not applicable

** Members of the Executive Board are only required to provide documentation to the Compliance Officer.

4.1.6 The most important points in brief

- **It is always forbidden** for Von Roll employees to **demand gifts and invitations from third parties.**
- **Accepting** or being promised **cash** is prohibited. The acceptance or promise of **gifts in kind** is only permitted under the rules set out in this **Directive.**
- **Document** the donation using the form provided.
- **Gifts over a value** of **EUR 200.00** may not be retained. In coordination with the Compliance Officer, they must be donated, raffled or distributed among the workforce.
- **Accepting** or being promised **entertainments** or **invitations** is **permissible** only if there is a **direct business connection**, the benefit is in line with **normal business practice** and the threshold values set **out in this Directive** are not exceeded.

- **Exceptions to the internal rules** are possible on a **case-by-case basis** and after **consultation** with the **Executive Board**.
- Are you **uncertain** or in **doubt** as to whether your conduct is in accordance with the law? The Compliance Officer is available for **further clarification** at any time.

4.2 Dealing with invitations and gifts: What may I give to others?

4.2.1 General Principles

Small gifts are order of the day among business partners. Of course, any use of corporate assets must be in Von Roll's interest.

Also note that benefits between business partners can be interpreted as unfair influence. There is therefore a risk of accusations of corruption. This means the abuse of one's professional position to gain a material or immaterial advantage to which one has no claim.

Von Roll does not tolerate corruption, which is a criminal offence against both public officials and private business.

Particularly when dealing with state and local authorities, public institutions and bodies that perform public administration tasks, it must be ensured that no benefits are promised or granted to the persons working there in order to influence their actions.

The granting, offering or promise of benefits of any kind is subject to strict limits. If your counterpart demands an invitation or other gratuity from you, you must always refuse to fulfill this request.

Please note the following general rules:

- The giving of (cash or book) money to third parties is prohibited to Von Roll employees in connection with their duties at Von Roll outside controlled and approved contractual relationships.
- Invitations (e.g. to events or a business dinner) and gifts (e.g. a bottle of wine or a book) are permitted for the purpose of maintaining business relations, for advertising purposes or for certain occasions (birthdays, anniversaries) if the principle of reasonableness is observed. The advantage must be within the framework of generally accepted business practices, always keeping in mind the hierarchical position of donor and recipient as well as the individual occasion.
- It is always forbidden to relocate to the private sphere: Donations on a private level are not permitted if there are also professional connections between you respectively Von Roll and the recipient.
- Benefits which are paid by the employee from his own resources are also not permitted.

- Under no circumstances may the donation result in the recipient making inadmissible decisions. The mere impression of such influence must be avoided.
- The threshold limits laid down in this Directive are expressed in EUR. They must be converted into the respective national currency according to local purchasing power. If the local legal regulations are stricter, they claim to be valid.
- In addition, the compliance regulations on the part of the recipient must always be observed when making a donation.
- No employee will suffer a personal or professional disadvantage if he or she fails to meet the demands of (possibly potential) business partners for benefits of any kind, even if Von Roll does not win a contract as a result.
- If in doubt, ask yourself whether the donation could damage Von Roll's reputation if it became publicly known.

The following principles apply:

- **Separation Principle:** Clear separation of benefits on the one hand and turnover transactions on the other.
- **Transparency and Approval Principle:** Disclosure of benefits to public officials and business partners involving (service) superiors; obtaining approvals.
- **Documentation Principle:** Written fixation of hospitality and gifts. Invitations to events are always issued in writing. Expenditure shall be recorded in a transparent and comprehensible manner.
- **Principle of equivalence:** The services and quid pro quo between Von Roll and its business customers are always in reasonable proportion to each other.

In case of doubt, the recipient should be asked to have the benefit granted or promised approved by his/her superior. If there are any uncertainties or doubts, please contact the Compliance Officer (e-mail: compliance@vonroll.com) at any time for further clarification.

4.2.2 Benefits to Public Officials

Corruption rules regarding public officials are strict. It is not only the granting of an advantage in return for a breach of duty by the public official that is punishable. A benefit can be already punishable if it is related to the general and lawful performance of the service and no longer appears socially appropriate, so-called "climate care".

Officials of the EU institutions and officials of foreign states are also generally covered by corruption law. The following rules therefore also apply in relation to these.

The term "public official" is broad. It does not only include representatives and employees of public authorities, public institutions or other bodies performing public administration tasks. Other persons who perform public duties on behalf of an authority may also fall under the definition of public official.

Examples:

- Mayor
- Engineers of state testing bodies
- Professors at public universities
- Employees of state-owned enterprises

Gifts, invitations or other benefits to public officials, other than low-value gifts, are permitted only on a case-by-case basis and subject to review and approval by the Executive Board.

Example: On the occasion of Christmas, you send a bottle of expensive red wine to a testing engineer of a state testing body who carries out certifications for Von Roll at regular intervals. A concrete certification is not pending, but you want to maintain a good relationship with the engineer.

4.2.2.1 Gifts

Value of gift granted to public official per year	Admissibility (internal rule)	Further action	Documentation
≤ EUR 10.00* (low-value gifts advertising and small gifts usually with company logo etc.)	Yes	Not applicable	Not applicable
> EUR 10.00* ≤ EUR 50.00*	Only in exceptional cases and only after approval by the Executive Board. The entire process must be documented.	Forwarding of documentation to the Compliance Officer.	Internal: Form No. 1
> EUR 50.00*	No	Not applicable	Not applicable

** The thresholds set out in this Directive are expressed in EUR. Outside the Eurozone they must be converted into the respective national currency according to local purchasing power. The thresholds refer to the total value of gifts made to a public official in a calendar year.*

4.2.2.2 Entertainment

Public Officials may be invited and entertained within narrow limits and for business purposes. Note the following:

- An invitation will only be issued if it is in Von Roll's interest.
- An invitation will only be issued after prior consultation with the supervisor.

- The inviter also takes part.
- The invitation does not give third parties the appearance of the possible purchasability of the public official.
- Spouses or life partners/other outside companions are not invited.
- Documentation is required, see **Form No. 1**.

Value of entertainment granted to a public official per year	Admissibility	Further action	Documentation
≤ EUR 50.00* (snack, small business lunches)	Yes.	Not applicable	Not applicable
> EUR 50.00* to EUR 100.00* (business lunch)	In individual cases on appropriate occasions and only with the approval of the Executive Board. The invitation must be documented.	Documentation for accounting and forwarding of documentation to the Compliance Officer	Internal Compliance Form No. 1
> EUR 100.00*	No	Not applicable	Not applicable

* The thresholds set out in this Directive are expressed in EUR. Outside the Eurozone, they must be converted into the respective national currency according to local purchasing power. The thresholds refer to the total value of entertainment granted to a public official in a calendar year.

4.2.2.3 Events

4.2.2.3.1 Technical and Business-Related Events

Public officials may generally be invited to specialist or business-related events. Note the following:

- An invitation will only be issued if it is in Von Roll's interest.
- The invitation will only be issued after prior consultation with the supervisor.
- The inviter also attends the business event.
- The invitation does not give third parties the appearance of the possible purchasability of the public official.
- The invitation is always made in writing. It is always written on Von Roll business paper and sent exclusively to the business address of the addressee.
- Spouses or life partners/other outside companions are not invited.

- The technical part of the event is the focus of the invitation; catering during the technical event will take place exclusively within an appropriate framework (snack, stand-up reception, finger food, business breakfast).

4.2.2.3.2 Invitations to events of a cultural or predominantly entertaining nature

Public Officials are not invited to cultural events or events of a predominantly entertaining nature because of their special duties. The Executive Board decides on occasion-related exceptions on special occasions.

4.2.3 Benefits to Private Business Partners

Bribery of public officials is not the only punishable offence; corruption regulations must also be observed with regard to private business partners.

Benefits to business partners in the private sector are permitted to a greater extent than benefits to public officials. The limit of criminal liability may be exceeded if the benefit is intended to achieve unfair competitive advantage in the future. Meaning the recipient is intended to decide in favor of the donor precisely because of the benefit and not on the basis of appropriate criteria.

4.2.3.1 Gifts

Benefits to business partners from the private sector are permitted without documentation and without approval up to a value of EUR 40.00 if they are made as a courtesy or in accordance with customary practices, e.g. promotional gifts or "giveaways".

However, it is by no means unusual for there to be concrete and individual situations in which even higher-priced gifts correspond to general business practices - for example because of the position of the recipient of the benefit or because of a special occasion. Such contributions are also permitted; for this purpose, written documentation is required and the relevant form must be forwarded to the Compliance Officer. Please use Form No. 1 for this purpose.

Example: A family member of a very good Von Roll business partner marries in India. You are also invited to this wedding, but do not take part in the celebrations and instead send an adequate gift. Value: approx. EUR 220.00.

If in doubt, you should reinsure yourself with the Compliance Officer before granting or promising a benefit (e-mail: compliance@vonroll.com).

Value of gift granted per person and per year	Admissibility (internal rule)	Further action	Documentation
≤ EUR 40.00* (Low-value gifts, giveaways, advertising and small gifts usually with company logo, etc.)	Yes	Not applicable	Not applicable
> EUR 40.00* ≤ EUR 200.00* (higher priced gifts, no character of a promotional gift)	Yes, the donation must be documented.	Forwarding of documentation to the Compliance Officer.	Internal: Form No. 1
> EUR 200.00*	Only in exceptional cases and only with the approval of the Executive Board. The entire process must be documented.**	Forwarding of documentation to the Compliance Officer.	Internal: Form No. 1

* The thresholds set out in this Directive are expressed in EUR. Outside the Eurozone, they must be converted into the respective national currency according to local purchasing power. The thresholds refer to the total value of gifts made to a person from the private sector in a calendar year.

** Members of the Executive Board are only required to provide documentation to the Compliance Officer.

4.2.3.2 Entertainment

You may invite your business partner to dinner if the invitation has a business connection and the type and extent of the entertainment is in accordance with normal business practice.

Example: Von Roll has won a very lucrative order in China for the supply of various products for the manufacture of power generation plants. After successful contract negotiations and the signing of the contract, you invite the managing directors and the executives directly involved in the contract negotiations to a dinner ("closing dinner") in an upscale restaurant in Guangzhou. Cost per person approx. EUR 150,00.

Note the following:

- An invitation will only be issued if it is in Von Roll's interest.
- An invitation will only be issued after prior consultation with the supervisor.
- The inviter also takes part.
- Entertainment shall be provided within reasonable limits. Choose the category of restaurant according to the specific circumstances, the private habits and the official position of the guest.
- Documentation for accounting is required.

Value of entertainment granted to one person per year	Admissibility (internal rule)	Further action	documentation
≤ EUR 50.00* (snack, standing reception, finger food, business breakfast)	Yes	Not applicable	Not applicable
> EUR 50,00* ≤ EUR 200.00* (business lunch, higher priced than above)	Yes, if it is appropriate in the individual case due to the concrete circumstances.	Forwarding of documentation to the Compliance Officer	Internal Form No. 1
> EUR 200.00*	No**	Not applicable**	Not applicable

* The thresholds set out in this Directive are expressed in EUR. Outside the Eurozone, they must be converted into the respective national currency according to local purchasing power. The thresholds relate to the total value of entertainment granted to a person from the private sector in a calendar year.

** Members of the Executive Board are only required to provide documentation to the Compliance Officer.

4.2.3.3 Events

You may invite your business partner to events if the event has a direct business connection, e.g. trade fairs.

Example: G-Ltd. intends to acquire products for energy transmission. To do this, G-Ltd. obtains offers about from Von Roll and two competitors. A presentation event by Von Roll in Augsburg will take place at the same time as the submission of Von Roll's offer. As the responsible employee at Von Roll, you invite the employees responsible for the decision at G-Ltd. to a weekend in Munich during which, in addition to the presentation of Von Roll at the Augsburg location, a visit to the Oktoberfest and a previous city tour will take place.

In these cases, only the invitation to the actual event is permitted. If other benefits are offered in addition to the event (in the form of travel, hotel accommodation and participation in the supporting program), written documentation and submission of the relevant form to the Compliance Officer are required. Please use **Form No. 1** for this purpose.

Example: G-Ltd. intends to acquire products for energy transmission. To do this, G-Ltd. obtains offers from Von Roll and two competitors. You know that the employees responsible for the decision at G-Ltd. are fans of the Bayern Munich football club. For a match between the Bayern Munich football club and the Augsburg football club, you therefore buy tickets for so-called business seats and invite the employees of G-Ltd. to this top match.

Note: If the event is of a pure or predominant recreational nature, the granting of such an invitation will normally be inadmissible.

4.2.3.3.1 Specialist events

As a rule, business partners may be invited to specialist or business-related events. Note the following:

- An invitation will only be issued if it is in Von Roll's interest.
- An invitation will only be issued after prior consultation with the supervisor.
- The inviter also attends the business event.
- The invitation is always made in writing.
- The participation is documented, see form 1.
- Spouses or life partners/other outside companions are not invited in principle. In exceptional cases and after consultation with the Executive Board, the invitation of accompanying persons is possible. Please note that the value of the third party's invitation will be attributed to the person invited.
- The professional part of the event is the focus of the invitation; catering during the technical event will take place exclusively within an appropriate framework.
- Documentation for accounting is required.

4.2.3.3.2 Other events of a business nature or events of a cultural or predominantly entertaining nature

As a rule, business partners may be invited to events of a business-related nature or cultural events or events of a predominantly entertaining nature.

Business events can be those in which the focus is on cultivating contacts and deepening personal business relationships or which serve as a communication platform.

This category includes, for example:

- Business Breakfast
- Invitations to industry or network meetings
- Invitations in connection with traditional events
- Invitations to traditional events
- Invitations to sports facilities

Please note the following in connection with such invitations:

- An invitation will only be issued if the guest's presence is in Von Roll's interest.
- An invitation will only be issued after prior consultation with the supervisor.
- The inviter also attends the business event.
- The invitation is always made in writing.
- The participation is documented.
- Documentation is required, see Form No. 1.
- Spouses or life partners/other outside companions are not invited in principle. In exceptional cases and after consultation with the Executive Board, the invitation of accompanying persons is possible. Please note that the value of the third party's invitation will be attributed to the person invited.
- Entertainment during the event will only take place within reasonable limits.

Type of event	Admissibility of participation (internal rule)	Further action	Documentation
Trade event with direct business reference	Yes	Documentation for Accounting	Internal Form No. 1
Technical event with a non-technical component (e.g. supporting program) as well as other business related events.	Yes, as long as the non-technical part does not predominate or in individual cases for appropriate occasions The thresholds of the above table (table hospitality) shall be observed in each case and the assumption shall be documented.	Documentation for accounting and forwarding of documentation to the Compliance Officer	Internal Form No. 1
Event with predominantly or purely recreational character	No*	Not applicable*	Not applicable

* Members of the Executive Board are only required to provide documentation to the Compliance Officer.

4.2.4 The most important points in brief

- **The thresholds set out in this directive are expressed in EUR.** Outside the euro zone, they must be **converted into local currency according to local purchasing power.** Where the **country-specific rules** are **stricter** than those set out in this directive, **they shall apply.**
- The **donation of (cash or book) money to third parties outside the framework of the proper management of contracts concluded is prohibited.**
- The **granting, offering or promise of gifts** to third parties is **permitted** only if the **limits set out in the Directive** are **not exceeded.** In addition, the **internal regulations of the recipient** and any **deviating, country-specific requirements must** always be taken into account.
- The **granting, offering or promise of hospitality and invitations** is socially customary and therefore **permitted where there is a business connection,** the gift is in accordance with **normal business practice** and the **limits set out in the directive** are **not exceeded.** In addition, the **internal regulations of the recipient** and any **deviating, country-specific requirements must** always be taken into account.
- **Exceptions to the internal rules** are possible on a **case-by-case basis** and after **consultation** with the **Executive Board.**
- **Gifts, invitations or other contributions to public officials** are **generally not permitted.** Above a trivial limit (promotional gift, "giveaway"), they are **only permitted after examination and approval** by the Executive Board.
- **Document** the donation using the form provided (**Form No 1**).
- Are you **uncertain** or in **doubt as to** whether your conduct is in accordance with the law? The Compliance Officer is available for **further clarification at** any time.

5. Related Documents

- Compliance Form No. 1