

Anti bribery and corruption policy

Favorite Gifts B.V. and its subsidiaries¹, further named Favorite Gifts, is committed to conduct its business fairly, transparently, with integrity and in compliance with applicable laws and regulations of the different jurisdictions it operates in. We follow the Principles of the UN Global Compact and the OECD guidelines against corruption². The purpose of this policy is to prevent bribery and corruption and protect Favorite Gifts' integrity and reputation.

Who does the policy apply to?

This anti-bribery and corruption policy applies to everybody who works with or for Favorite Gifts. This includes directors, (temporary) employees, subsidiaries, contractors, suppliers or any other parties Favorite Gifts collaborates with, regardless of their location or function.

Definitions

Bribery: the improper offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favors etc.).

Corruption: the improper use of entrusted power for personal gain or that of family, friends or acquaintances. This can involve e.g. bribery, kickbacks and/or conflicts of interest.

Fraud: To cheat. The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise).

As stated, Favorite Gifts aims to comply with applicable anti-bribery and anti-corruption legislation and prohibits bribery and corruption in all ways, i.e. given or received, directly or indirectly. This means:

1. Never offer any undue benefits: avoid any form of bribery, unauthorized payments or benefits to secure contracts or orders.
2. Refrain from bribing employees of business partners, including subcontractors, procurement partners or any other party with whom Favorite Gifts collaborates.
3. Compensation for intermediaries and facilitation payments should be transparently communicated and be fair and provided solely for legitimate services.
4. The exchange of gifts and entertainment must be appropriate. Favorite Gifts is in the business of giving gifts, but when we give or receive gifts or entertainment, please be mindful that this may never be done in exchange for business, services, confidential information, or with the intention of influencing a decision. Some gifts and forms of entertainment are never acceptable, because they are illegal or could

¹ FL BV, Favorite Gifts Print Europe Sp. Z O.o., A. van Helden Relatiegeschenken BV, Van Helden Relatiegeschenken BV, Van Heijster Relatiegeschenken BV, EuroGifts Belgium NV, EuroGifts France SAS, Giving Europe BV, Giving Europe GmbH, Giving Europe France SARL, Giving Europe Italia SL, Giving Europe Iberia SRL

² <https://www.oecdguidelines.nl/oecd-guidelines/combating-corruption>

damage our reputation; for example, anything that can be seen as bribery and anything that is offensive or inappropriate. When in doubt, and if the consumer value of the offering exceeds €100,- (including taxes), always talk to your manager. They can help you make the right decision.

5. Pro-actively handle conflicts of interest. Conflicts of interest can occur when your interests or activities are of influence on your ability to make objective decisions for Favorite Gifts. Be conscious of the different ways in which a conflict of interest may occur. For example:
 - External business or connections with competitors, customers, or suppliers;
 - Having an intimate relationship with another employee who makes decisions regarding salary or job performance evaluations or can influence promotions;
 - Being part of the management of another organization;
 - Investments that can be of influence (or have the appearance of being of influence) on your judgment.

Inform your manager of situations that could lead to a conflict of interest (or could create the appearance of a conflict of interest). We will determine together how to handle the situation.

6. Never make illegal contributions to candidates for public office or political parties or to other political organizations.
7. Favorite Gifts rejects any form of fraud and takes proactive measures to prevent it, actively working to identify and minimize potential fraud risks within the organization. We acknowledge that fraud is a method, with which other irregularities, including corruption, are committed. Fraud includes, but is not limited to:
 - Internal and external threats;
 - Misuse of funds or assets;
 - Theft;
 - Every form of corruption, including facilitation payments and money laundering;
 - Manipulation of annual financial statements;
 - Neglecting to report law violations, or violations of the rules and regulations or procedures of Favorite Gifts

In case of misbehavior

Violation of this policy is unacceptable. In case of misbehavior, employees will face proportionate disciplinary actions. The possible sanctions can vary from an informal talk with a notification to a dismissal with immediate effect in case of gross misconduct, theft, fraud, violence or violations that significantly harm Favorite Gifts or its reputation. Favorite Gifts will always respect the applicable laws.

Speak up!

If you have questions on this policy or if you want to express your concerns on a possible situation of bribery, corruption or fraud, you can take the following actions:

1. You can register any misconduct confidentially and/or anonymously via our whistleblower procedure at: <https://whistleblowersoftware.com/secure/FLBV>

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2. You can address your direct manager, HR contact person, or a member of the board and discuss how to handle the situation.

Training

Our staff is trained yearly on our anti-bribery and corruption policy, specifically our Board of Directors, Middle Management and other key positions in our organization and the defined risk positions within Favorite Gifts. All employees have received a copy of this policy via e-mail or in printed version. The policy is also available on our website www.favoritegifts.eu