



# GROUP GENERAL MANAGEMENT POLICY 3

## Anti-corruption and anti-bribery

Reference	Version	Date
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**Executive summary:**

- Soitec has a zero-tolerance policy for any violations of anti-corruption and anti-bribery laws.
- Prior to engaging with third parties, third party due diligence must be conducted following specific risk factors (**Appendix 1**).
- The offer and acceptance of gifts and hospitalities are strictly limited (**Appendix 2**).
- Donations and sponsorships are subject to prior approval.
- Potential conflicts of interests must be reported internally.

Soitec is committed to conducting its activities with integrity, to fight **corruption** and **influence peddling** and to strictly comply with all applicable laws combating corruption or bribery (French Sapin 2 law, U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, etc.) with a **zero-tolerance policy for any wrongdoings**.

The applicable rules as well as applicable processes that relate to **third party risk assessment** and **gifts and hospitalities** are introduced in this policy.

### Applicable rules:

1. **Facilitation payments are prohibited:** any attempt to obtain any kind of preferential treatment from a public official or a private company by any means whatsoever (including gifts, invitations, cash or any other advantage) is prohibited.
2. **Payments in cash are prohibited.**
3. No commitment nor contract shall be made with customers, first rank suppliers or intermediaries meeting specific risk factors, without having completed prior **third-party due diligence** as per the procedure of **Appendix 1**.
4. The offer and acceptance of **gifts and hospitalities** are strictly limited and subject to the procedure of **Appendix 2**.
5. **Donations and sponsorships** are subject to prior approval and integrity checks, as per the procedures of **Appendices 1 and 2**.
6. **Contributions to political parties are prohibited.**
7. Any potential **conflict of interests** must be reported in writing by the person in a situation of potential conflict for prior written approval to his/her line manager in charge of whether accepting it or implementing mitigation measures and documenting the overall process.
8. Any **representation of interests and lobbying activities** are to be registered when required under applicable laws.
9. Integrity, anti-corruption and anti-bribery **due diligences** are completed in the context of **merger and acquisition deals**.
10. **No hiring shall be made under pressure.**

### Responsibility:

- It is the responsibility of each Soitec employee to ensure compliance with these rules.

### **Roll-out of the policy and of appended procedures:**

- This policy is applicable to **all Soitec legal entities** and implemented in countries in which they operate and/or have export sales.
- Violation of this policy should be immediately reported as per the **ethics alert process** appended to the [Code of conduct](#), and in particular on the [Maât ethics alert line](#).
- Any breach of this policy by Soitec's employee may result in **disciplinary action**, including dismissal.
- **Tools** are deployed internally to allow all employees to comply with this policy. For instance, a form for declaring gifts and invitations received or offered and a form to declare conflicts of interests are available on MyServices ([MyCompliance](#)).
- Periodic corruption risk assessments are completed across the Group. The most recent update of the corruption **risk mapping** was finalized in 2024.
- **Accounting controls** are made to check books and compliance of activities with this policy.
- Mandatory **training** required for exposed employees, **awareness** and **communication** plans (newsletters, compliance week, etc.) are deployed every year.
- Compliance and deployment of the above are included in the Quality control Plan completed every year.
- Questions related to this policy may be directed to [compliance@soitec.com](mailto:compliance@soitec.com).

## Appendix 1 – Third-party risk assessment procedure

It is critical to check the integrity of the third parties we work with, prior to engaging with them and on a regular basis throughout the business relationship.

### Criteria for assessing gross risk :

Gross risk is assessed according to the following criteria:

1. third-party category;
2. yearly business volume (actual or foreseeable at the start of the relationship); and
3. the most recent corruption perception index published by [Transparency International](#) for the country in which the third party is based.

Third-party category	Yearly business volume (EUR)	<a href="#">Transparency International</a> index		
		≥ 71	51-70	≤ 50
<b>1. Direct customers</b>  <b>2. 1st-tier suppliers</b> (including service providers, consultants, subcontractors, etc.)	> 10 M	Screening	Screening + Questionnaire	Screening + Questionnaire + Inquiry
	5-10 M	Screening	Screening + Questionnaire	Screening + Questionnaire
	200 k - 5 M	N/A	Screening	Screening
	< 200 k	N/A	N/A	Screening
<b>3. Intermediaries</b> (sales agents, business introducers, development consultants, customs brokers, distributors, or any intermediary involved in the sales or purchasing process)	<b>No condition</b>	Screening	Screening + Questionnaire	Screening + Questionnaire + Inquiry
<b>4. Innovation partners</b> (including universities and research organizations)	<b>No condition</b>	N/A	Screening	Screening
<b>5. Candidates for employment as sales managers</b>	<b>No condition</b>	N/A	N/A	Inquiry
<b>6. Partner company in a joint venture, or target company in an acquisition.</b>	<b>No condition</b>	Screening	Screening + Questionnaire	Screening + Questionnaire + Inquiry
<b>7. Person or organization sponsored or to which a Soitec charitable contribution is made</b>	<b>No condition</b>	Screening	Screening	Screening + Questionnaire + Inquiry

**Risk assessment and prevention procedures :**

Gross risk level	Low	Moderate	Major	Critical
Assessment method	N/A	Screening	Screening + Questionnaire	Screening + Questionnaire + Inquiry
Description	N/A	Assessment using public or subscription databases	A questionnaire is sent to the third party to assess its probity and the robustness of its risk prevention system.	Carrying an on-the-field investigation
Role of the Business teams*	Inform the Compliance team when in case of a new relationship with a third party			
Person in charge	N/A	Compliance team	Compliance team	Compliance team + External service provider
Frequency	N/A	At the start of the relationship, when renewing a contract, and at least every 3 years		
Other mitigation measures	Communication of the Soitec Code of Conduct Insertion of contractual Compliance clauses			

\*Business teams: Customer Group for customers and intermediaries, Procurement for suppliers, Innovation for R&D partners, Human Resources for the hiring process, Strategy for mergers and acquisitions, and Communication for donations and sponsorship.

**If any red flags are identified** during the assessment (e.g. judicial convictions, politically exposed person, sanctions list, negative press, non-existent or weak corruption risk prevention system), the Compliance team informs the business team as soon as possible in order to discuss how to continue the business relationship with the third party.

## Appendix 2 - Gifts and hospitalities procedure

Improper or excessive **gifts** and **hospitalities** can be a form of bribery, fraud, or corruption, which is prohibited by Soitec Code of conduct as well as by the law. Gifts and hospitalities are acceptable in a professional context, if not designed to obtain or give an **undue advantage**, and if they do not generate a **conflict of interest**.

This procedure sets Soitec's minimum standards on gifts and hospitalities, where local laws impose a stricter standard, it must be applied.

### Applicable rules:

Unless written approval is given by the ExCom member of your department:

1. **No gifts of any value** should be promised or given to **public agents**, whether being government officials, belonging to a government organization or a government affiliated company.
2. **No gifts in cash** or equivalent (e.g., gift card) may be promised, accepted, or given.
3. Any gift or hospitality, whether offered or received, **must relate to business purposes**, and must be permitted by local applicable laws and regulations and by beneficiary's organization specific codes or policies, if any.
4. Soitec employees (including their families or relatives) **must not accept gifts or hospitalities with a value greater than EUR 200** or equivalent in local currency, and no more than once a year from the same counterparty.
5. **No gifts may be promised or offered to third parties** (including their families or relatives) **if the value exceeds EUR 200** or equivalent in local currency, and no more than once a year to the same third party. For the avoidance of doubt, no gifts or hospitalities may be promised or offered on the personal expense of a Soitec's employee to circumvent the rule defined herein.
6. In the context of invitations of a **group of persons**, the EUR 200 (or equivalent) per person limitation still applies but cannot be for a group exceeding 5 persons.
7. No matter the amount, **sponsorships, patronage and donations** to charities may be authorized by an ad-hoc committee (including at least representatives of the Communication, Compliance and Finance departments), which ensures that:
  - a. the project does not raise a situation of conflict of interests;
  - b. the project is in line with Soitec Group's brand image;
  - c. the beneficiary of the sponsorship, donation or patronage has been the subject of a prior assessment in accordance with **Appendix 1** above;
  - d. the project is of a reasonable amount. Above 50,000 euros, ExCom representatives must be involved.

### Modalities:

Gifts and invitations received or offered must be declared on the [MyCompliance](#) form available on the MyServices interface, or by e-mail to your department's ExCom member and the compliance department ([compliance@soitec.com](mailto:compliance@soitec.com)).

## Questions and answers

### What is corruption?

Corruption is the act of offering, giving or agreeing to give, directly or indirectly, any undue advantage (or prospect of advantage) to a person, for himself/herself or for someone else, in order to perform or refrain from performing something. Corruption can:

- Be active (offering, giving an undue advantage: the fact of corrupting) or passive (accepting, soliciting an undue advantage: being corrupted);
- Concern public or private persons;
- Be direct or indirect (via intermediaries);
- Be done or suggested (promise, solicitation);
- Take place at any time.

The advantage goes beyond offering a sum of money (i.e. bribe) but covers any advantage such as gifts, hospitality, preferential treatment, benefits in kind, etc.

The consideration sought or expected may consist of:

- The conclusion or renewal of a contract;
- Obtaining a discount on the price of a good or service;
- Obtaining a visa, an authorization to operate;
- A tax or customs advantage, etc.

#### **A contract against a benefit in kind**

A customer has just launched a call for tenders for the supply of wafers. The client's purchasing manager offers to award the contract on the condition that in exchange he be granted an all-expenses-paid invitation for him and his family to two weeks in San Francisco to attend Semicon West.

PROHIBITED: the purpose of the proposed proposal may be to grant an undue advantage to win the call for tenders.

#### **Mergers and acquisitions**

PROHIBITED: In order to obtain an undue advantage:

- Proposing to a third party to sell or acquire a business asset or an interest in a company, at a price that does not correspond to the real value of the asset ;
- Agreeing, at the request of a third party, to sell or acquire a business asset or an interest in a company, at a price that does not correspond to the real value of the asset;
- Acquire a business or a majority shareholding in a company, without implementing a plan to identify any acts of corruption or influence peddling previously committed by this target.

#### **Real estate transactions**

PROHIBITED: Proposing to a third party to carry out a real estate transaction or to enter into a lease, under abnormally onerous conditions: purchase price, rent, payment of a final indemnity, forfeiture clause, payment for office fitting-out services or refurbishment work, on return of the

sites.

### What is influence peddling?

Influence peddling means offering, granting, agreeing to grant – or soliciting or accepting – directly or indirectly, any advantage whatsoever to a person so that he/she abuses his/her influence, real or assumed, in order to obtain a favorable decision from a public administration. Influence peddling involves at least:

- a beneficiary, who is the person wishing to benefit from a favorable decision and who provides the benefit;
- an intermediary, who is the one who uses the credit he/she has because of his/her position with a target person and who receives the advantage; and
- a target person who holds decision-making power (public official, public authority, public administration, etc.).

Influence peddling is likely to be characterized:

- whether the other party accepts or refuses the advantage (the mere offer, promise or solicitation of advantage is sufficient);
- whether the actual granting of the promised or proposed advantage takes place or not;
- whether the actual use of influence takes place or not;
- whether the expected favorable decision is obtained or not; and
- regardless of the nature of the benefit offered or granted (amount of money, gifts, benefit in kind, etc.).

### Intercede to obtain an administrative decision

An employee wants to speed up a procedure for issuing building permits for a new building. He asks one of his friends working at the town hall to intercede with the mayor to obtain the permit. In exchange, he will send a gift of three hotel nights in Paris.

**PROHIBITED:** it is prohibited to offer a benefit to a third party so that he/she abuses his/her influence with a decision-maker in order to obtain a decision favorable to Soitec.

### What are the risks for Soitec of corruption and influence peddling?

Acts of corruption and influence peddling can lead to:

- heavy criminal penalties (imprisonment and fines) for both Soitec and its employees;
- the payment of damages to third parties harmed by acts of corruption or influence peddling;
- contracts and markets declared null and void;
- ban of participation to public markets; and
- damage to the image and reputation of Soitec.

### What is a facilitation payment?

Facilitation payments are small sums of money or benefits of any low value, paid or granted in a hidden manner to a public official to speed up an administrative procedure.

**Urgent visa**

An employee urgently needs a visa and the embassy announces a deadline of 15 days with the emergency procedure. The agent in charge of the file indicates that, exceptionally, he/she can "do a favor" to issue the visa in 24 hours subject to the payment to his/her benefit of 500 euros in cash and without a receipt.

PROHIBITED: The payment does not correspond to an official service and no invoice/receipt has been issued. This is a facilitation payment request.

**What is a public official?**

A public official is a person holding a legislative, administrative or judicial mandate within a State, a community, and who exercises a public function or is entrusted with a public service mission.

**How do we know who is a government official or employee?**

A government official or employee is anyone who works for or represents a government, including:

- employees of governmental departments and agencies, regardless of their rank;
- employees of state-owned or controlled entities, including state-owned or controlled commercial enterprises;
- employees of public international organizations, such as the World Bank, the International Monetary Fund and the United Nations;
- any political party official or candidate;
- any judge or legislator;
- customs' official/representative;
- members of royal families; and
- anyone "acting in an official capacity" (that is, under a delegation of authority from the government to carry out government responsibilities), including uncompensated officials if they have actual influence in awarding government business or technical or marketing consultants who also hold a government position.

**What is a politically exposed person?**

Any individual who is either an "Initial PEP" or, by extension, a "Relative" of an Initial PEP.

- An Initial PEP is a person who cumulatively meets the following two criteria:
  - on the one hand, he or she is a public official or senior official of a public company or political party, in the customer's country or end customer, who is currently in office or has been out of office for less than three years;
  - and on the other hand, this person, by virtue of his or her function or mission (current or past), may influence the final decision to award a contract or procurement contract by the customer or end customer, or may influence the position to be taken by the customer or end customer in the performance of a contract or procurement contract.
- A Relative of an Initial PEP is any of the following:
  - parents, brothers and sisters, children of the Initial PEP, as well as the spouse(s), notorious cohabitee(s) or companion(s) of these children;

- spouse, common-law partner or companion of the Initial PEP, as well as the ascendants and descendants of this spouse, common-law partner or companion of the Initial PEP;
- persons closely associated with the Initial PEP, i.e. any person who is widely and publicly known to have close ties, including business ties, with the Initial PEP, including the beneficial owner of a legal entity, legal person or legal arrangement held jointly with the Initial PEP or known to have been established for the benefit of the Initial PEP.

**Relations with PEPs**

PROHIBITED: Proposing to grant a public official or a PEP, an undue advantage, directly or indirectly:

- in return for a decision favorable to Soitec; or
- in order for the latter to abuse his or her real or supposed influence with a view to obtaining a decision favorable to Soitec.

**What is a conflict of interest?**

A person is in a situation of conflict of interest when financial or direct / indirect personal interests relating to his/her private sphere are or may be in contradiction with the interests of Soitec and thus influence the impartial exercise of his/her duties. These may be personal interests of an employee but also those of people close to him/her (spouse/husband, family, friends, etc.). The conflict may also arise from extra-professional links developed with customers, suppliers, partners or competitors of Soitec.

Conflicts of interest are not illegal as such, but they can question the objectivity, neutrality and impartiality of a decision and conduct to corruption, influence peddling or favoritism.

**Conflict of interests**

PROHIBITED: Putting oneself in a situation of conflict of interest, such as:

- Having Soitec purchase goods from a company in which one of his close relations has decision-making power linked to the contract;
- Recruiting as a consultant a person with whom he has a personal relationship;
- Participate in an activity or project in competition with the Group's activities;
- Occupy, or have a close relative occupy, a decision-making position within an authority exercising a power of control over the Group's activities;
- Hold an elected office or responsibilities within a public authority that has the power to make decisions that could interfere with Soitec's interests.

## Conflicts of interests - How to prevent them?

### Definition

**A conflict of interests may be...**

Internal to Soitec	External to Soitec
When two employees have a relationship (couple, family, friends, etc.)	When a Soitec employee has a relationship with a supplier, customer, etc.
Budget allocation HR evaluation	Project management Hiring Financing Call for tender

**A conflict of interests may be...**

Actual	Apparent	Potential
Putting personal interests ahead of Soitec's interests	Giving the impression of putting personal interests ahead of those of Soitec	Having a private interest that could constitute a conflict if circumstances were to change
Ex.: Not organising a call for tenders to select the company of a relative	Ex.: A relative's company is selected following a call for tenders to which I contributed	Ex.: A relative works for a supplier who could, one day, participate to a call for tenders

### Example

Is a buyer at Soitec

Is close (spouse, family, friend, etc.) to consulting firm

Award a consultancy service

**Interests of Soitec:** organising a call for tenders to obtain the best service at the best price

**Buyer's interests:** not to organise a call for tenders and to favour her relative's firm

**Relative's interests:** obtaining the contract at the highest price

**Personal interests**

**Conflict**

### Prevention

**Discuss about it**

If in doubt, discuss the matter with your line manager, colleagues involved in the project, the Compliance department, etc.

**Step off from the project**

If an actual or apparent conflict is confirmed, do not take part in negotiations and deliberations, even unofficially, on the project in question.

**Report**

If you suspect a conflict of interests, report it via the [ethics alert system](#): HR, social partners, [Maât](#) platform, etc.

### What are third parties?

Third parties are all persons and companies with which Soitec is in contact to carry out its activities: customers, suppliers, subcontractors, consultants (lawyers, various advisers), intermediaries, professional associations, public authorities, etc.

An intermediary is a person or company that can be a commercial agent, business introducer, trader or consultant.

### What are representation of interests and lobbying activities?

Representation of interests, more commonly referred to as lobbying, refers to the activity consisting in influencing, directly or indirectly, public decision-making, in particular the content of a law, by getting in touch with one or more public decision-makers.

Representation of interests is a lawful activity and allows the public authorities, when making a decision, to know the different interests involved. Representation of interests differs from influence peddling as the means used to influence public decision-making are legitimate and are based on economic, political, commercial or technical arguments.

### What are patronage, donations and sponsorships?

Patronage is financial or material support provided by a company without seeking direct economic compensation, to an organization carrying out a non-profit activity. This support is provided with a view to supporting an activity of general interest.

Donations are a means of granting a sum of money, goods or services for charitable purposes, without expecting any direct advantage. Donations are generally made to non-profit organizations.

Sponsorship (or sponsoring) consists of contributing financially and/or materially to a social, cultural or sporting action, in return of services or visibility agreed by both parties.

Donations, patronage and sponsorship may be used to conceal an improper advantage. They may turn out to be, or be considered to be, acts of corruption, whether direct or indirect, regardless of

their value. This risk is accentuated in the event that the beneficiary events or activities have direct or indirect links with public officials.

### **Patronage, donations and sponsorships**

#### PROHIBITED:

- Carrying out actions with the sole aim of obtaining an undue advantage, or unduly influencing an official decision;
- Making contributions in cash, or payments to a third party other than the beneficiary organization, or payments required on an anonymous account;
- Carrying out actions with a link to a person in a decision-making position in a current call for tenders or selection process, or in the performance of a contract;
- Carrying out actions generating a conflict of interest with the personal interests of a Group employee. It is imperative to take care not to carry out sponsorship or patronage actions benefiting, directly or indirectly, public officials or Politically Exposed Persons.

### **What is a gift or advantage?**

A gift or advantage is anything of value or something that provides value to the recipient, which is offered to or received from a person or entity outside of Soitec in conjunction with Soitec's business. It may include things like gift baskets, wine bottles, baseball caps, coffee mugs, and likewise items, sports or cultural events tickets, trips, vacations, gift cards and use of personal property, equipment, and services (including without limitation hiring the relative of a person for an internship etc.).

### **What is corporate hospitality or entertainment?**

It is the fact for a company to entertain its customers, employees, and business partners, for example by inviting them to big events, in order to create or keep a good relationship with them. It can include meals, beverages, attendance to sports or cultural events or other activities that are shared with the representatives of Soitec's business partners. Additional examples include meals, golf outings, and tickets to a concert or travel expenses. To qualify as hospitality (as opposed to a gift) both a Soitec employee and a representative of a Soitec's business partner have to be present at the event or activity.

### **Expenses reimbursement**

#### PROHIBITED: using expense reimbursement to:

- obtain undue personal enrichment; or
- cover a payment enabling Soitec to obtain a favorable decision or an undue advantage.

### **Which business partners are concerned by this procedure?**

Any business partner of Soitec, whether it be a customer, a supplier, a consultant, a distributor, an agent, etc.

**What are acceptable gifts and hospitalities?**

Modest (i.e. not lavish or extravagant) business-related gifts and hospitalities that are given or received in reasonable quantities. The safest types of gifts to provide/receive are company marketing items such as ordinary stationary, calendars, baseball caps, coffee mugs, etc., that could not be perceived by the receiver as likely to alter his/her business judgment.

**Press relations**  
 PROHIBITED: offering a gift or invitation to a person in a position to influence the editorial content of a press article concerning the Soitec Group.

**Gifts & hospitalities - What can I give or receive?**

	<b>Why?</b>	<ul style="list-style-type: none"> <li>✓ Unsolicited and unrequited gifts</li> </ul>	<ul style="list-style-type: none"> <li>✗ To obtain something in return (contract, decision, etc.)</li> </ul>
	<b>Who?</b>	<ul style="list-style-type: none"> <li>✓ All Soitec employees</li> </ul>	<ul style="list-style-type: none"> <li>✗ Relatives (family, friends, etc.)</li> </ul>
	<b>What?</b>	<ul style="list-style-type: none"> <li>✓ In line with business practices: diner, wine bottle, sporting or cultural event, etc.</li> </ul>	<ul style="list-style-type: none"> <li>✗ Cash or equivalent (gift card, etc.)</li> <li>✗ Services (house rental, etc.)</li> </ul>
	<b>To whom? From whom?</b>	<ul style="list-style-type: none"> <li>✓ Supplier, customer, prospect, etc.</li> </ul>	<ul style="list-style-type: none"> <li>✗ Public employees, civil servants</li> <li>✗ Relatives (family, friends, etc.)</li> </ul>
	<b>How much?</b>	<ul style="list-style-type: none"> <li>✓ Below USD 200</li> <li>✓ One gift per year per third party</li> </ul>	<ul style="list-style-type: none"> <li>✗ Above USD 200</li> <li>✗ Several gifts per year per third party</li> </ul>
	<b>When?</b>	<ul style="list-style-type: none"> <li>✓ Usual periods (Christmas, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>✗ Before/after an important decision (tender, negotiation, contract award, etc.)</li> </ul>
	<b>Where?</b>	<ul style="list-style-type: none"> <li>✓ Business sphere (office, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>✗ Personal sphere (home delivery, etc.)</li> </ul>
	<b>How?</b>	<ul style="list-style-type: none"> <li>✓ <a href="#">Gifts &amp; hospitalities procedure</a> (p. 9-11)</li> <li>✓ <a href="#">MyCompliance</a> declaration form</li> </ul>	<ul style="list-style-type: none"> <li>✗ Concealing a gift offered or received</li> <li>✗ Bypassing the procedure</li> </ul>

**When do I need to seek pre-approval for a gift or hospitality that I want to offer to a business partner?**

You should obtain written approval from the ultimate executive VP of your department before offering gifts or hospitalities with a value greater than the applicable financial threshold or if you are in doubt about its value or its nature.

**What should I do if I receive a gift from one of our business partners that exceeds the procedure limits?**

Generally, gifts exceeding this procedure’s value limits should be returned to the sender with a note explaining that acceptance is contrary to this procedure. Alternatively, and subject to the ultimate Executive VP of your department prior written approval, the gift may be kept by Soitec and displayed or used or shared with other colleagues.

### **Are my family members covered by Soitec's gifts and hospitality procedure?**

Your family members are concerned to the extent that you are not permitted to accept indirect (through a family member) benefits that you would not be permitted to accept directly. So, for example, if this procedure prohibits you from accepting front-row tickets to a music concert that have been offered to you by one of Soitec's business partners, your family members and relatives are likewise prohibited from benefiting from those tickets.

### **How is the market value of a gift determined?**

It can sometimes be difficult to determine the value of a gift or of hospitalities that is offered to you. Use common sense and good judgment in determining the value of gifts and hospitalities received. Often, an Internet search will quickly provide you with the accurate value of an item. When in doubt, consult with the Compliance department or your manager.

### **What if I receive more than one gift from a business partner in a given year?**

You should consider the total value of gifts and hospitalities received from the same business partner in a given year. Even if the value of each gift and hospitalities received from a single business partner is below the applicable financial threshold, it can be problematic if you receive too many.

### **Timing and frequency**

Giving or accepting a gift must not be contemporaneous with a commercial bid award or business renewal decision time. An employee should avoid giving gifts near a time when he/she is soliciting a business response from the recipient, such as negotiating a contract.

### **Are donations acceptable?**

A gift or hospitality donation is acceptable if given to a non-governmental organization such as a hospital, museum or a charity.

### **Customer relationship-building events and activities and site visits**

Business trips to view organization facilities or to appropriate sites where products, services or capabilities can be demonstrated are generally permissible. Such trips are designed to provide the potential customer with important and sufficient information to enable informed decision-making.

### **Use of approved vendors and sources**

Any gifts or hospitalities as well as trips should be obtained from approved vendors and sources and comply with Soitec purchasing policies.