

1

# WHAT IS AN ACT OF CORRUPTION?

It's the giving or offering to give something of value to an individual with the intent to obtain an improper benefit



It's not only money!



Facility payments, favouritism, EXCESSIVE discount or commission



Unreasonable hospitality, drinks, meals, entertainment and transportation



Charitable, political contribution or donations

## 2

## FOUR AREAS TO WATCH

### Third Parties



Third parties pose high risk of corruption. Services provided by third parties need to be recorded. Make sure they comply with the laws, and perform due diligence checks

### Hospitality



Exchanging gifts strengthens relations but may influence decisions. Unreasonable and frequent gifts, trips, meals, entertainment are prohibited

### Donations



Charitable donations should not be made in order to obtain a commercial contract

### Facilitation Payments



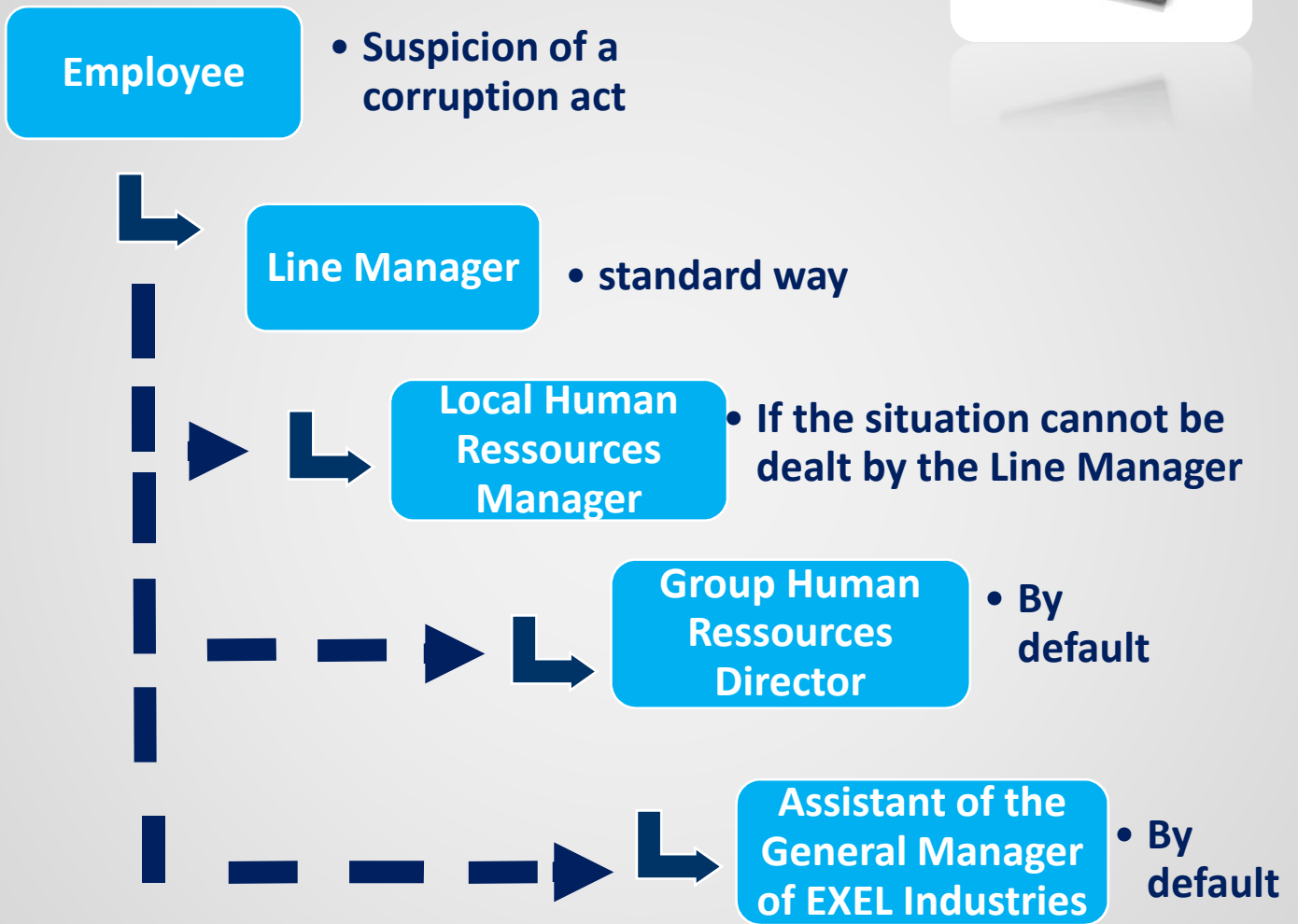
Facilitation payments to public officials are prohibited, except if legally acceptable and appropriate to the service provided



Refer to EXEL Industries' Code of Conduct

# 3

## INTERNAL ALERT SYSTEM



**All alerts are confidential,  
and will be processed in a due time**

# 4

## YOUR RESPONSIBILITIES



**Perform your duties to the highest ethical standards, and comply with EXEL Industries' code**



**Be vigilant to identify and report any corruption act to your Line Manager once you notice them**



**Before receiving or providing anything of value, ask yourself if it could be perceived as an act of corruption**



**A question? Need for an advice?  
[complianceadvice@exel-industries.com](mailto:complianceadvice@exel-industries.com)**