



Executive Summary of BNP Paribas's Gifts, Invitations and Other Advantages Procedure (published on May 16th 2022)

The BNP Paribas procedure for gifts, invitations and other advantages forms part of the corruption prevention and detection system established by BNP Paribas. The defined rules and processes apply to all BNP Paribas employees, regardless of their seniority or hierarchical status¹.

Gifts, invitations or other advantages, common business practices, can conceal corruption and influence peddling. That is the case if they influence an individual to engage or not in an action in breach of his legal, contractual or professional obligations.

▪ **Elements of definition**

A gift is given or received in a dematerialized or tangible format, whether it is branded or not.

Invitations can be business (including meals)² or leisure³.

Other advantages refer to any benefit, contribution or reward, other than a gift or an invitation.

▪ **Risk Management for Gifts, Invitations and Other Benefits**

Employees, Management and/or Compliance must identify and prevent situations at risk of corruption in accordance with the guiding principles defined in this procedure. These principles are as follows:

- The reasonableness and proportionality of the gift, invitation or other advantage offered or accepted;
- The prohibition of offering, receiving or soliciting anything that would be considered as placing undue influence on a third party or as compensation for business;
- Do not compromise the integrity or reputation of BNP Paribas or one of its Entities.

Factors relating to the consideration, purpose and value of the gift, invitation or other advantage and its frequency must be taken into account in any assessment from the point of view of the risk of corruption.

▪ **General principles for gifts and invitations**

A value ceiling (referred to as *De Minimis*) for gifts and invitations has been defined by the procedure, above which Management approval and, in some instances, Compliance approval are required depending on whether a gift or an invitation is involved. These rules have been shaped by the standard of living of different countries as well as indicators of corruption.

Any gift or invitation below *the De Minimis* ceiling does not require the approval of the Management or Compliance. However, the employee must always assess the potential risks of corruption before any offer or acceptance, including when below *the De Minimis* threshold.

¹An employee is a natural person working within the Group, on a permanent or temporary basis, in France within the framework of an employment contract, a temporary assignment, a secondment or abroad under equivalent conditions, or a trainee or alternance.

²Events of a few hours, a day or a few days, mainly focused on Business topics (80% of the total time must be devoted to business topics).

³Their main purpose is to entertain the guest(s) with cultural, recreational or social content, while promoting the inviting entity, and/or speaking business.



BNP PARIBAS

Important restrictions requiring, for example, a higher level of validation as well as prohibitions are defined in relation to the corruption risk specific to certain situations or the nature of certain counterparties. The procedure also provides for restrictions and/or specific requirements to be observed regarding risky Public Officials.

Any refusal of an invitation or gift must be recorded, whether or not there is a suspicion of corruption. Employees must report to their Management and to Compliance any situations that give rise to a suspicion of corruption or that are not in compliance with this procedure.

- **Principles of other advantages**

In their relationship with Clients or other third parties, employees are prohibited from offering or receiving any type of other advantage different from a gift or invitation. This procedure prohibits direct or indirect donations or subsidies to any form of political organization.

End of the document