

Gifts & Hospitality Guidelines

Relationships with our business partners can be built and strengthened through legitimate networking and social interaction. However, giving or accepting gifts and hospitality may create conflicts of interest or be considered corruption in certain situations. It must comply with applicable laws and internal guidelines to prevent unnecessary risks, penalties, and reputation damages.

- Gift are given without expectation of anything in return.
- Hospitality takes many forms: meals, beverages, seminars, receptions, social events, and entertainment.
- Travel includes the cost of transportation including taxis, buses, trains, flights, accommodation and hotels, and other travel costs.
- Any events/hospitalities above the thresholds set below require approval from relevant "C-level" at Group or "Head of Level" in Country.

When a G&H is acceptable:

- Low value items and addressed to a large number of persons: brochures, pens, booklets, shirts, and similar, preferably with a logo.
- Gifts worth up to maximum **EUR 40** (same recipient/giver in a 12-month period).
- Hospitality (business lunch maximum **EUR 70**/dinner maximum **EUR 150 ***, conferences, business events) and there is a clear business agenda (same recipient/giver in a 12-month period).

When a G&H is unacceptable:

- Cash or cash equivalents (gift cards, tickets etc) or expensive, extravagant, or frequent gifts.
- During periods when important business decisions are being made, negotiations are ongoing, and contracts are to be signed.
- To influence business decisions or give other people a reason to suspect there might be an influence.
- An event where there is no host present.
- G&H that exceeds prescribed value limits unless the line manager and other required pre-approvals have been obtained.
- We do not allow business courtesies to be extended to family or close friends.
- Public officials: G&H shall not be given to or received unless pre-approved by the line manager in advance.

What employees should do?

- Heimstaden pays for travel and accommodation for its own employees.
- Be familiar with your organisation's guidelines on G&H – understand the requirements.
- Notify your line manager or Legal/GRC team if you suspect that you have been offered a gift or hospitality with corrupt intent.

Consult your line manager or a Legal/GRC team if in any doubt as to the right thing to do. If preferred, you could raise your concerns through our Whistleblowing channel.

*Countries may set lower values; these are maximum limits. Some countries also have specific tax levels to consider.