



Delta Corporation

LIMITED

GIFTS & HOSPITALITY POLICY

1. OBJECTIVE & SCOPE

Delta Corporation and any of its subsidiaries (“Delta Corporation” or “Company”) expects its employees to comply with applicable laws and to maintain the highest ethical standards of business conduct.

Please note that corruption may occur when dealing with commercial partners as well as Public Officials as defined below. Consequently, this Policy applies to the Company’s dealings with counterparties in both the public and commercial sectors.

2. POLICY

Delta Corporation has a zero tolerance policy toward bribery and corrupt conduct in any form. Improper inducements involving Public Officials, customers, suppliers, and all other counterparties are strictly prohibited.

Delta Corporation directors, officers, employees, and third party representatives are strictly prohibited from, either directly or indirectly through a third party, giving, offering, promising, or authorizing any financial or other advantage, or anything of value any other individual or organization, with the influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for Delta Corporation, or improperly reward the recipient for past conduct.

Delta Corporation also prohibits requesting, soliciting, agreeing to receive, or accepting a bribe, kickback, influence payment, or any other improper or unlawful inducement, benefit or advantage.

These prohibitions should be interpreted broadly.

- “Public Official” means officers and employees of the following, regardless of seniority:
- Local, regional, national, or other governmental entity (e.g.: mayors, local tax authorities, police, firemen...)
- Judicial bodies (e.g.: judges, clerks...)
- Legislative bodies (e.g.: members of parliament, members of the city council...)
- Government-owned or -controlled companies
- Charitable organizations
- Public international organizations (e.g.: the United Nations or World Trade Organization)



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“Public Official” also includes relatives of public officials, political parties, party officials, elected government officials, and candidates for public office, and any private person acting in an official capacity for or on behalf of any of the persons or entities listed above. No person subject to this policy will suffer adverse consequences for refusing to offer, promise, pay, give, or authorize an improper or unlawful payment, benefit, advantage or reward, even if doing so results in the loss of business opportunities for Delta Corporation.

3. GIVING GIFTS AND CORPORATE HOSPITALITY

All gifts, meals, entertainment and travel expenses are subject to the policies and procedures set forth in this Gifts & Hospitality Policy. A matrix setting out the limits and thresholds applicable to gifts, meals, entertainment and travel expenses is located at below.

Delta Corporation may not offer or provide a gift, meal, entertainment, travel expenses or other corporate hospitality to a Public Official or commercial counterparty as an incentive, or in exchange or as a reward, for granting a regulatory request, clearing products or supplies through customs, or providing any other improper benefit or improper advantage to the Company.

Delta Corporation may pay for or provide gifts, meals, entertainment, travel expenses or other corporate hospitality to Public Officials or commercial counterparties only if they are:

- legal and customary in the jurisdiction in which they are given;
- permissible under the internal rules of the recipient’s organization;
- given on a customary gift-giving occasion and in accordance with local business custom;
- given openly to the recipient;
- of a nature that would not embarrass Delta Corporation if publicly disclosed; and
- given in accordance with the policies and procedures set forth in this Gifts & Hospitality Policy.

All expenses must be supported by receipts and accurately recorded in the Company’s books and records and in the “gift log” maintained by the Group Corporate Affairs Department.

All gifts, meals, entertainment, travel and hospitality must be booked as such in the specific packages and sub-packages designated in the budget chart of accounts as follows:

- Expenses to Public Officials must be booked in the Group Corporate Affairs Donations and sub-package “Gifts & Hospitality Policy to Public Officials”.
- Expenses to Commercial counterparties (except customers) must be booked in the Institutional Package and sub-package “Non- charitable donations”.
- Expenses to customers must be booked in the Sales Package and sub-package “Customer relation - gifts / entertainment”

To the extent possible, all such expenses should be paid directly to the vendor of the services.



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Gifts

Gifts of cash or of cash - equivalents (such as gift cards or certificates) are always prohibited.

Prior written approval to the Group Corporate Affairs Department is required before providing any gift to a Public Official.

GIFT LIMITS AND THRESHOLDS			
RECIPIENT	LIMITS	NO PRE - APPROVAL REQUIRED	COMPLIANCE PRE - APPROVAL REQUIRED (GROUP CORPORATE AFFAIRS OFFICER)
Commercial Counterparty	\$100 USD per gift AND No more than 2 gifts for the same person within a 12-month period	Gift valued at < \$100 USD	None
Public Official	\$100 USD per gift AND No more than 2 gifts for the same person within a 12-month period	Pre-approval by Group Corporate Affairs Officer always required	Pre-approval by Group Corporate Affairs Officer always required

You must consult with your Group Corporate Affairs Department to seek approval and to log the gifts. Approval is given on-line through the Compliance Channel.

Any exception to the rules for Commercial Counterparties must be approved by the Group Corporate Affairs Department. Any exceptions to the rules for Public Officials must be approved by the Group Corporate Affairs Department.

Meals

The purpose of a business meal provided by Delta Corporation is to facilitate business communications and foster better business relations. Accordingly, at least one Delta Corporation employee should be present at any business meal provided by the Company.

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MEAL LIMITS AND THRESHOLDS			
RECIPIENT	LIMITS	NO PRE - APPROVAL REQUIRED	COMPLIANCE PRE - APPROVAL REQUIRED (GROUP CORPORATE AFFAIRS OFFICER)
Commercial Counterparty	\$100 USD per guest AND No more than 2 meals for the same person within a 12-month period AND No spouse or guest sponsored by the Company	Meals of < \$100 USD per guest	None

Any exception to the rules for Commercial Counterparties must be approved by the Group Corporate Affairs Department. Any exceptions to the rules for Public Officials must be approved by the Group Corporate Affairs Department.

All meals provided to Public Officials must be logged by the Group Corporate Affairs Department. You must notify your Compliance Department through the Compliance Channel.

Individual country operations are encouraged to consider setting lower limits, giving due consideration to the cost of living in the region or country.

Entertainment

The purpose of entertainment provided by Delta Corporation (e.g.: tickets for matches and concerts) is to facilitate business communications and foster better business relations. Accordingly, it is advisable at least one Delta Corporation employee should be present at any entertainment provided by the Company.

Prior written approval of the Group Corporate Affairs Department is required before providing any entertainment to a Public Official.

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ENTERTAINMENT LIMITS AND THRESHOLDS			
RECIPIENT	LIMITS	NO PRE - APPROVAL REQUIRED	COMPLIANCE PRE - APPROVAL REQUIRED (GROUP CORPORATE AFFAIRS OFFICER)
Commercial Counterparty	\$200 USD per guest per occasion AND No more than 2 occasions for the same person within a 12-month period AND No spouse or guest sponsored by the Company	Entertainment valued at < \$200 USD per guest per occasion	None
Public Official	\$200 USD per guest per occasion AND No more than two invitations for the same person within the prior twelve months AND No spouse or guest sponsored by the Company	Pre-approval by Group Corporate Affairs Officer is always required	Pre-approval by Group Corporate Affairs Officer always required

All entertainment must be logged. You must consult with your Group Corporate Affairs Department to seek approval and to log the invitations given. The approvals are given electronically through the Compliance Channel.

Individual country operations are encouraged to consider setting lower limits, giving due consideration to the cost of living in the region or country.

Any exception to the rules for Commercial Counterparties must be approved by the Group Corporate Affairs Department. Any exceptions to the rules for Public Officials must be approved by the Group Corporate Affairs Department.

Travel Expenses

Travel expenses, including food and accommodation, will be approved only if they are directly related to the promotion of Company products or the execution of a contract.

In addition to the restrictions set forth above, Delta Corporation may only pay for travel or related expenses for a Public Official or commercial counterparty if:



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- the travel is for a legitimate business purpose;
- the cost is reasonable given the recipient’s seniority;
- no friends and family members of the recipient are traveling at the Company’s expense; and
- no stopovers are planned that are not directly connected to the business purpose of the travel, unless the stopover is at the expense of the Public Official and results in no additional cost to Delta Corporation.

Per diem expenses (defined as fixed payments to an individual intended to cover expenses incurred on a particular day, regardless of the nature and extent of expenses actually incurred that day) are prohibited unless required by applicable law or agreed in advance and in writing with the recipient’s organization.

All travel or related expenses that are incurred for or on behalf of a Public Official or commercial counterparty must be requested in writing and approved in advance by the Compliance Department.

TRAVEL LIMITS AND THRESHOLDS			
RECIPIENT	LIMITS	NO PRE - APPROVAL REQUIRED	COMPLIANCE PRE - APPROVAL REQUIRED (GROUP CORPORATE AFFAIRS OFFICER)
Commercial Counterparty	Pre-approval by Group Corporate Affairs Officer always required	Pre-approval by Group Corporate Affairs Officer always required	Pre-approval by Group Corporate Affairs Officer always required
Public Official	Pre-approval by Group Corporate Affairs Officer always required	Pre-approval by Group Corporate Affairs Officer always required	Pre-approval by Group Corporate Affairs Officer always required

4. ACCEPTANCE OF GIFTS AND HOSPITALITY

Delta Corporation employees are not allowed to accept anything of value including gifts (even small gifts or gratuities), entertainment, travel or meals from an actual or potential supplier, customer, public official or other third party.
If you receive a gift in these circumstances, it should be turned over to Delta Corporation to be auctioned or donated.

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Business-related conferences and networking events, including incidental meals and refreshments, are permitted.

Travel, entertainment and meals should not be paid for by a third part, rather employees should pay for their own expenses and seek reimbursement according to the Delta Budget Policy.

Any exception to the rules must be approved by the Group Corporate Affairs Department.

ACCEPTANCE OF HOSPITALITY OFFERED TO DELTA CORPORATION EMPLOYEES			
HOSPITALITY OFFERED	LIMITS	NO PRE - APPROVAL REQUIRED	COMPLIANCE PRE - APPROVAL REQUIRED
Gifts	Acceptance of gifts is not allowed (gift received must be turned over the Company to be auctioned or donated)		
Meals	Acceptance of meals is not allowed (except incidental meals and refreshments in the context of business conferences and networking events)		
Entertainment	Acceptance of entertainment is not allowed unless the employee or Delta pays for it		
Travel	Acceptance of travel is not allowed		



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- Be recorded in a manner that permits the preparation of financial statements in accordance with applicable international accounting standards;
- Be in compliance with the applicable tax legislation; and
- Maintain accountability of assets.

All supporting documentation should be kept in line with the applicable record retention requirements

No undisclosed or unrecorded fund or asset may be established or maintained for any purpose.

No employee shall participate in falsifying any accounting or other business record, and all employees must respond fully and truthfully to any questions from the Company's internal or external auditors or the auditors of any regulatory authority.

5. SEEKING ADVICE AND REPORTING POTENTIAL VIOLATIONS

The underlying philosophy of our Code of Business Conduct and the Company's Gifts & Hospitality Policy is that there should be no gap between what we say and what we do. A crucial element of this is the commitment to an open culture where people feel secure in seeking advice and raising concerns.

If you have any questions regarding the application of the Gifts & Hospitality Policy, you should seek advice from the Legal or Compliance Department. You can also use the Compliance Channel to submit any questions you may have.

If you have any concerns regarding the application of the Gifts & Hospitality Policy, you should speak directly with your line manager or local Compliance team. However, if you feel that this would not be appropriate, there are other ways of raising your concerns.

Delta Corporation encourages each employee to report any activity that you believe is or might be a violation of laws, regulations, or this Policy.

You can contact the Group Legal & Corporate Affairs Department.

Delta Corporation prohibits and will not tolerate any retaliation or threatened retaliatory action against any employee who reports a possible violation of law, regulation or the Company's Gifts & Hospitality Policy. Similarly, any Delta Corporation employee who discourages or prevents another either from making such a report or seeking the help or assistance he or she needs to report the matter will be subject to disciplinary action. Retaliation is a violation itself and can be reported to our Tip Off Anonymous Hotline.

All reports of non-compliance with the Gifts & Hospitality Policy will be reviewed as a priority. To ensure that we can fully investigate any concerns, please provide as detailed an account as possible including any supporting evidence.

Once a matter has been investigated, it is reviewed by the relevant business unit's ManCom. and may be reported to the Company's Audit Committee.

The outcome of an investigation can range from no further action being taken (e.g., where allegations are not substantiated) to formal disciplinary action against an employee, up to and including termination of employment.