

Procedure Title: GIFTS AND GRATUITIES		Procedure Number: HR-015
Approved By: Jerome Eymard	Date: 11/14/2024	Revision: (13)
Approved By: Rachael Battaglia	Date: 11/14/2024	Supersedes Revision: (12) Dated 02/13/2018
Last Reviewed On: 11/14/2024		

Bollinger requires all employees to act with integrity and good judgment and recognize that accepting personal gifts, gratuities, loans or excessive entertainment from suppliers may cause legitimate concerns about favoritism.

All Bollinger employees must completely abide by the laws and regulations of local, national and international governing bodies. Adherence to high ethical standards is also expected and required. Any employee not complying with this policy shall be subject to appropriate corrective action. If a Bollinger officer, manager or employee has any questions regarding the propriety of a gift, the disclosure of the gift must be made to their General Manager or **Operations Support** Manager for determination of the proper course of action.

Overall, management must assure conformity to this policy by insisting on full compliance by all officers, managers, and employees.

Some of the most common instances of unacceptable and acceptable actions under the policy are listed below for your review:

- No Company employee may solicit or accept cash or gift cards in any amount;
- Any Company employee wishing to solicit donations for a Bollinger sponsored event or organization shall obtain approval from President and CEO by routing the request to the *EVP and Chief Legal Officer*;
- Company employees are not permitted to solicit or accept gifts, gift cards, personal loans, services or other special considerations from any individual or business organization doing business with the Company, except for promotional items of a nominal value. {NOMINAL VALUE is defined as supplier advertising literature or promotional items with a value less than \$25 per occurrence – not to exceed \$100 in total value during any calendar year.}; To clarify, gift cards of any value as a promotional item is strictly prohibited;
- No Company employee may solicit donations, gifts, services or other special considerations for any event either sponsored by Bollinger or any employee, department, facility, etc. without first obtaining approval and authorization from President and CEO by routing the request to the *EVP and Chief Legal Officer*;
- Any Company employee who is offered or receives such gifts or services of more than the nominal value shall refuse it or return it to the giver in a tactful and dignified manner advising the giver of the Company's policy prohibiting its acceptance;
- No Company employee may solicit or accept offers of entertainment or recreational opportunities above a nominal value, such as, but not limited to: professional or college sporting events, fishing or hunting trips, golf outings, vacation packages, etc. {NOMINAL VALUE is defined as entertainment or recreational opportunities with a value less than \$25 per occurrence – not to exceed \$100 in total value during any calendar year.};
- If such an event (above) is considered to be beneficial to Bollinger, approval may be granted to the employee by the appropriate Executive Group member, or in the case of an **Operations Support** employee, the *EVP and Chief Legal Officer* or *EVP and Chief Financial Officer*. Notification of approval shall also be made to the *EVP and Chief Legal Officer* in all cases;
- From time to time, employees will participate in sporting, recreational or other events as a representative of the Company or in which an entry fee has been paid by the Company. If the employee wins a prize or gift with a value equal to or greater than \$25 per occurrence – not to exceed \$100 in total value during any calendar year, the employee may conditionally accept the prize or gift but must report the prize or gift to the appropriate Executive Group member. They will decide if it is appropriate for the employee to accept, return, or otherwise handle the gift or prize. Notification of the prize or gift and final outcome shall also be made to the *EVP and Chief Legal Officer* in all cases;

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- Loans are not to be accepted from an individual or organization having current or prospective dealings with the Company unless such individual or organization is in the primary business of making loans to individuals;
- Association with supplier representative(s) at luncheons, dinners or business/professional organization meetings are helpful in establishing better business understanding and is neither questionable nor unethical, provided the Company employee keeps himself or herself free of obligations;
- No Company employee shall permit any influence that could conflict with the best interest of the Company or prejudice the Company's reputation;
- As noted above, Bollinger requires all employees to act with integrity and good judgment and therefore should recognize that by providing personal gifts, gratuities, loans, or excessive entertainment to foreign government officials may be in violation of the Foreign Corrupt Practices Act. Any such gifts or payments made to any foreign government official must be in compliance with the Foreign Corrupt Practices Act and with Bollinger's Employee Code of Conduct.