

## **POWERLINES Group Compliance Policy**

### **Guidelines on the Prevention of Corruption and Conflicts of Interest**

#### **1. Corruption**

POWERLINES does not tolerate any form of bribery or corruption. Therefore, this Directive sets forth further details of POWERLINES' policy on corruption, bribery, facilitation payments, charitable donations and sponsorships (see section 5.1 of the Group Compliance Policy accordingly).

#### **A Bribery & Granting or Receiving of Improper Advantages**

POWERLINES and its representatives will not offer, give, or receive bribes or other improper advantages of any kind for any purpose, whether directly or through a third party, regardless of whether for the execution of a task in accordance with that person's duties or contrary to that person's duties and irrespective of whether in connection with a specific transaction for the benefit of POWERLINES or not.

##### ***i. What do we mean by bribery and granting or receiving of improper advantages?***

The receiving or offering of an improper advantage (e.g. gifts, invitations) by or to any public official or a private individual designed to influence them to improperly exercise their duty, or to induce them to act contrary to the known rules of honesty and integrity. Please note that bribery as well as granting or receiving of improper advantages are sanctioned by criminal law.

##### ***ii. Examples for bribery not tolerated under this Directive***

- An employee offers to pay an amount of money to a representative of a potential customer in exchange for that representative awarding a tender to POWERLINES.
- An agent offers a payment to a foreign public official in order to secure government approval to award a permit.
- An employee offers a payment to a tax official in order to pay less official taxes.

##### ***iii. What do we mean by improper advantage?***

Improper advantage means any benefit to which the recipient has no legal entitlement, including but not limited to

- material advantages (e.g. cash payments, payments in kind, invitations to events; gifts); and
- immaterial advantages (e.g. promoting a job application or the granting of an award; extending a time-limit).

##### ***iv. What do we mean by public official?***

A public official is

- a person who performs tasks of legislation, administration or justice as an employee or official of a state, a public entity or an international organization (e.g. civil servants; judges; members of parliament; employees of public universities);
- any other persons who are entitled to enforce laws on behalf of a state, a public entity or an international organization;

- any person who works as an official or employee for a company that is owned, operated or controlled by a public entity or that is subject to the auditing of the Austrian Court of Audit<sup>1</sup> (e.g. Wien Energie; Wiener Linien; ÖBB; Post; Flughafen Wien; ORF; Verbund, KELAG); and
- any other persons and/or entities as reflected in the applicable Country Annex.

## **B Facilitation Payments**

Neither staff members nor other persons working for POWERLINES shall make facilitation payments. Facilitation payments are minor amounts of money usually given to public officials in order to obtain or accelerate services of such persons to which one has a legal right (e.g. for passport control, customs clearance).

POWERLINES will not, and will not tolerate others acting on its behalf to make facilitation payments to third parties not legally entitled thereto.

### ***i. What do we mean by facilitation payments?***

Facilitation payments are (usually relatively small) unofficial payments made to public officials, to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement. Such payments often occur due to the recipient extorting such payment by using the power of his or her official position and where the consequence of not paying may be out of proportion to the small payment demanded. Fees required by law, such as emergency / express surcharge payments and similar charges officially requested by public officials on the basis of verifiable legislation, do not constitute facilitation payments. In cases of doubt please ensure provision of an invoice / receipt for any payment and consult with your superior before any payment is made. If refusing a facilitation payment results in additional costs or delays, this will be accepted by POWERLINES as a normal consequence of strictly applying this Directive.

### ***ii. Examples for facilitation payments not tolerated under this Directive***

- An immigration official demands € 50 'entry fee' from an employee at an airport used frequently by company employees to be allowed entry to the country, even though the employee's passport and visa are all in order.
- A customs official demands €150 to give priority clearance to goods arriving in port even though all import duties and paperwork are in order.

## **C Direct and Indirect Bribery by Third Parties**

All POWERLINES Companies must be dedicated to carefully selecting our business partners, intermediaries and all other third parties supporting us or acting on behalf of POWERLINES. Adequate steps must be taken to ensure that such third parties do not pay or accept bribes or facilitation payments within the scope of their business operations (in the form of compliance clauses as recommended in Attachment 3 to the Group Compliance Policy).

---

<sup>1</sup> For Austria, please refer to the list of companies to be audited, published on the homepage of the Court of Audit as a first indication: <http://www.rechnungshof.gv.at/beratung/pruefobjekte.html>.

---

## **D Gifts and Invitations**

POWERLINES and its representatives will not offer, give or receive any gifts or invitations and other advantages (as defined above in section 1.A. subsection iii, e.g. tickets, transport, loans, accommodation, meals, etc.) which are intended, or may be seen, as a bribe or improper advantage, or which may place, or be perceived to place (directly or indirectly) the recipient under an obligation towards the party offering or giving such gift or invitation. As a matter of principle, accepting and making monetary gifts is prohibited. All other gifts and invitations are subject to transparency, adequacy, compliance with customary local business practice and the rules set forth in the attachment on “Gifts and Invitations” hereto. Furthermore, gifts and invitations exceeding a value of € 100,-- are subject to registration and approval (see section ii.).

### ***i. Why do we need rules on gifts and invitations?***

Gifts, invitations and other advantages can be problematic in commercial life because they may have an improper influence on decision taking. Such gifts, invitations and other benefits may even be prohibited under criminal law; already the mere invitation of a public official may constitute a criminal offence in certain cases.

Please note that the laws are particularly strict if a public official is involved. Therefore, whenever you plan to give a gift or issue an invitation, you have to ascertain in advance whether the recipient is a public official (as defined in section 1.A., subsection iii. above) or works in the private sector. In cases of doubt please consult with your superior on the appropriateness of giving a gift or invitation.

### ***ii. Registration and approval requirement for grants > € 100,--***

In addition, all gifts, invitations and other benefits to third parties that exceed a value of € 100,- - must be recorded in a central register kept by the respective **local management**. Such grants must also be expressly approved in advance by the local management..

This also applies to cases where several gifts/invitations are granted to the same recipient, provided that the total value of these exceeds € 100,-- in a calendar year. In this case, both the grant whose value exceeds this threshold for the first time and all subsequent grants to this recipient in the same year are subject to registration and approval.

### ***iii. Examples for gifts / invitations not tolerated under this Directive***

- Inviting a public official (e.g. an ÖBB employee) on an ‘all expenses paid’ basis to a sporting event in a distant location that would, for instance, require transport and/or accommodation.

### ***iv. Gifts and invitations in the private sector***

Private sector means that only private companies are involved and there is no relation whatsoever with a public official as defined in section 1.A. subsection iv. above.

POWERLINES’ staff members are permitted to accept or give gifts and invitations in connection with their work subject to the conditions listed hereinafter:

- Gifts of money or cash equivalents must never be given or accepted.
- Gifts, giveaways and invitations must not be linked with any sort of conditions or service in return and from an objective point of view may not place, or be perceived to place (directly or indirectly) the recipient under an obligation towards the party offering or giving such gift, giveaway or invitation.
- A small gift of low value which is given just once for reasons of local custom or market practice (such as Christmas or birthday presents) is accepted.
- Customary and typical giveaways (such as a small bouquet of flowers, chocolates, simple calendar or pen etc.) are permitted.
- A donation (gift/invitation) with a value of > € 100,-- must be registered and approved by the local management.
- Invitations: invitations to a meal or to a professional, social or sports event that are in accordance with fair and customary local market practice and with the position of the recipient, are permitted (irrespective of any registration and authorisation requirements), however in any event excluding travel costs.
- The accepting and offering of customary and typical giveaways, gifts and invitations of low value which are in compliance with the above mentioned criteria are generally permitted, whereas the accepting and offering of gifts and invitations which represent more than a low value always need to be reported in advance to the superior. If the grant exceeds a value of > € 100,--, it must also be reported to the Local Managing Directors, registered and approved by them.
- In case gifts and invitations do not meet the conditions set forth above the superior shall decide in advance whether or not the benefit may be granted or accepted and if the employee may keep the benefit.

An overview of the applicable rules and conditions is provided in the Attachment “Gifts and Invitations” hereto.

**v. *Gifts and invitations in the public sector***

Public sector means gifts and invitations to public officials as defined in section 1.A. subsection iv. above.

The superior must always be informed in advance before offering any gifts, giveaways or invitations to public officials. In case of doubts, alignment with the Local Managing Directors shall be sought. In addition, the following conditions apply:

- Gifts of money or cash equivalents must never be given.
- Gifts are generally not permitted. Exceptions must be approved by the superior in writing.
- Public officials may neither be influenced in their function (not even to act in accordance with their duties) nor may a generally supportive atmosphere be sought to be created by way of gifts or invitations.
- Giveaways, gifts and invitations must not be linked with any sort of conditions or services in return and from an objective point of view may not place, or be perceived to place (directly or indirectly) the recipient under an obligation towards the party offering or giving such gift, giveaway or invitation.

- Customary and typical giveaways of low value (such as small bouquet of flowers, chocolates, calendars, pens) must be reported in advance to the superior.
- Such gift / giveaway may only be acceptable provided that the value is low and in accordance with local customary market practice and the position of the recipient.
- Invitations for public officials are generally only permitted with prior approval of the superior (on an exceptional basis and only in the event of an invitation to a business meal where the circumstances do not allow for obtaining prior approval, such invitation must be reported to the superior immediately afterwards).
- An approval for invitations may generally only be granted if the above principles are met and subject to the following conditions: invitation is for (i) an ordinary business meal in accordance with customary local business practice and the position of the recipient; (ii) a professional event with a broad group of invitees where a clear and objectively justified official interest exists on the side of the public official (and/or the respective authority) to participate in such event.
- Bilateral invitations and invitations with a small group of invitees are generally not permissible, unless such invitations demonstrably occur on a mutual basis or are clearly motivated by private reasons only (i.e. public official is a private friend). In such case the superior needs to be informed in advance.
- In case of invitations, we strongly recommend to ascertain that the public official is allowed to accept the invitation.

An overview of the applicable rules and conditions is provided in the Attachment “Gifts and Invitations” hereto.

#### **vi. Further Guidance**

POWERLINES recognizes that laws and market practices may vary across the jurisdictions in which it does business and what is considered adequate and compliant with local market practice may vary. Always adopt a common sense approach and ask yourself whether you would feel comfortable to read about the gift / invitation offered or received in the newspaper.

In addition, the limit of € 100,-- must always be observed, which leads to an obligation of registration and approval of the grant in question by the local management.

### **E Charitable Donations and Sponsorship**

We will support, sponsor and contribute to social and community activities that are aligned with POWERLINES’ business objectives and values. Such donations and social investment must not be made so as to create the perception of impropriety or unfair advantages in competition, in particular when dealing with public officials, politicians and others of influence.

Each project selected locally must first undergo an evaluation process in which fundamental compliance risks are examined and assessed (see section E. ii.). Each project subsequently requires the prior approval of a committee consisting of the POWERLINES Group management and the head of the department concerned. The (non-)granting of this approval is recorded in an internal approval form (Attachment 3 for donations or Attachment 4 for sponsorships).

It is important that in all cases we act transparently, ethically and in good faith. In any event, contributions in the form of donations and sponsoring may not be used in order to circumvent our guidelines on the acceptance and provision of gifts, the prohibition of bribes, etc.

***i. What do we mean by charitable donations and sponsorship?***

Donations are voluntary contributions in cash or in kind made to third parties for scientific, social, cultural, environmental, educational purposes without provision of any services in return. Any donation must be documented transparently and may not be made to achieve any improper advantages for the benefit of POWERLINES.

Sponsoring means any contribution in cash, in kind or services for the benefit of an event or cause organized by a third party. In return for its contribution POWERLINES shall receive the right to publicly display its logo and to promote its brands and products, potentially also to participate as a speaker, to be mentioned in the inaugural address and/or to receive tickets for that event. Generally, sponsoring of political parties or purely political events shall be prohibited; exceptions may be permitted by Group Management Board.

***ii. Evaluation Process***

Before a donation or a sponsorship is granted, an internal evaluation process must first be carried out, unless an exceptional circumstance is fulfilled which allows to waive this evaluation by way of exception (final decision of the Group Management Board).

In the evaluation process, a search in public and specific databases will be carried out, whereby a minimum of information must be identified in accordance with Attachment 2. In this course, any identified "Red Flags" must be recorded. A committee consisting of the Group Management Board and the head of the Corporate Communication department shall take the result of this evaluation process into account in its decision.

***iii. Overview***

- Any donation or sponsorship granted by POWERLINES must be documented and occur in a transparent, proportionate way and requires the prior approval of the POWERLINES Group Management Board .
- Any amount granted must be reasonable and proportionate to the circumstances.
- Any donation shall be given without any intention to obtain something in return (other than enhancing POWERLINES' image).
- Any sponsoring may only be made on the basis of a written sponsoring agreement which specifies the recipient of the contribution made by POWERLINES, the event, the amount of POWERLINES' contribution as well as the other conditions of the contribution made by POWERLINES.
- Before donating and before entering into a sponsoring agreement the integrity of the other party must be confirmed in the course of an evaluation process to avoid any reputational harm to POWERLINES. In addition, such check must ensure that no conflicts of interest exist (e.g. no business decision pending with the third party concerned, no family relationship etc.).

## **2. Conflicts of Interest**

All employees must ensure that their personal interests do not conflict with their duties vis-avis POWERLINES or its customers and business partners. This Directive sets forth further details of POWERLINES' policy on conflicts of interest (see section 4.5. of the Group Compliance Policy accordingly).

Conflicts of interest may arise from close (personal) relationships between staff members and customers, representatives of business partners or other employees. In particular, potential conflicts of interest may arise in connection with gifts, invitations, awards of contracts, and other transactions. Conflicts of interest can also be linked to corruption and fraud. Any such situations of conflict must be reported to the superior, who will then decide whether a conflict of interest actually exists and what measures to take.

### ***i. What do we mean by conflicts of interest?***

Conflicts of interest occur when we find ourselves in a situation where two or more competing interests conflict and impair our ability to make objective, unbiased business decisions. A conflict of interest can take many forms:

- private and company interests are mixed;
- allowing private interests to influence business decisions; and
- financial or personal considerations may influence judgement when carrying out employment duties and responsibilities.

### ***ii. Conflicts of interest***

- We at POWERLINES consider loyalty as our staff members' key responsibility. Acting loyally means to take any business decisions in the best interest of POWERLINES.
- You must inform your superior in case of a potential conflict of interest and obtain his/her prior approval in writing before taking any action or business decision that could be affected by such a conflict of interest.
- In any event, the following circumstances are subject to prior authorization by your superior:
  - Becoming personally involved, whether directly or indirectly, in any transaction involving POWERLINES;
  - Negotiating or contracting on behalf of POWERLINES with an entity in which the employee, a relative or friend or other third party with whom the employee has a close relationship has an involvement from which any or all of these parties may benefit;
  - Accepting any employment, consultancy, directorship, partnership or jointventure interest or anything similar outside POWERLINES;
  - Directly or indirectly acquiring shares of a competitor of POWERLINES; ○ Accepting or continuing employment within POWERLINES if the persons accepting or continuing employment have a close relationship with each other and by acceptance or continuation could get in conflict with the duties they owe to the POWERLINES. In particular, actions which are subject to the principle of dual control must not be performed jointly by employees who have a close relationship with each other.

***iii. Examples for conflicts of interest not tolerated under this Directive***

- An employee does not disclose a second job in a third party corporation which is a customer, competitor or potential business partner of POWERLINES.
- Recruiting a close family member or close friend or such persons performing services for POWERLINES' customers, suppliers or business partners.
- Serving on the board of directors in a corporation that is not part of POWERLINES.



**Attachment 1:  
Gifts and Invitations**

**I. Giving and receiving of GIFTS in the PRIVATE SECTOR (→ no public official<sup>2</sup> involved)**

Permissible, no need for approval if the following conditions are met	
✓	Customary and typical giveaway (e.g. small bouquet of flowers, chocolates, simple calendar or pen).
✓	Small gift of low value given once in accordance with local custom or market practice (e.g. Christmas or birthday present).
Prior report to superior & the following conditions are met	
!	Gift representing more than just a low value or given more than once over a calendar year (e.g. expensive wine etc).
!	Invoices must be issued to POWERLINES Company concerned with address.
Prior registration and approval of the local management	
!	Gift whose value exceeds € 100,-- or which, together with the gifts granted to the recipient in the current calendar year, exceeds the amount of € 100,--.
Not permissible	
X	Gifts of money or cash equivalents.
X	Link between gifts / giveaways and any sort of conditions or service in return (recipient may not be placed, or be perceived to be placed under an obligation towards the party offering or giving such gift/giveaway).
X	Demanding a gift / giveaway.

**II. Issuing and accepting of INVITATIONS in the PRIVATE SECTOR (→ no public official involved)**

Permissible, no need for approval if the following conditions are met	
✓	Ordinary business meal.
✓	Invitation to professional event (direct business relevance obvious to all, e.g. trade show).
✓	Business relevance must exist.
✓	Low value, nature and scope must be compliant with customary local business practice and with position of the recipient.
✓	Invitation is voluntary, not in anticipation of a return service/preferential treatment.
✓	Invitation may only apply to event as such, not to travel, hotel or fringe events.
Prior report to superior	
!	Invitations representing more than just a low value, events with non-business relevance (e.g. fostering relations by visiting a sports event)
!	The aforementioned conditions with regard to permissible invitations need to be considered by the superior.

Prior registration and approval of the local management	
!	Invitations which represent more than a value of € 100,--
!	Invitations to a multi-course dinner that exceeds € 100,-- per invited person.
Not permissible	
X	Invitations contradictory to the aforementioned guidelines
X	Requesting an invitation of any kind.
X	Link between invitation and any sort of conditions or service in return (recipient may not be

<sup>2</sup> For the definition of public officials, see section 1.A.iv. of these Guidelines.

	placed, or be perceived to be placed under an obligation towards the party offering or giving such invitation).
--	---

### III. Giving GIFTS IN THE PUBLIC SECTOR (→ public official<sup>3</sup> involved!)

Subject to prior report to the superior	
!	Customary and typical giveaway of low value (e.g. small bouquet of flowers, chocolates, simple calendar or pen).
Subject to prior approval of superior & the following conditions are met	
!	Gifts are generally not permitted; exceptions must be approved by the superior in writing (email sufficient).
!	Gift must be of low value, in accordance with local market practice and position of the recipient.
Not permissible	
X	No gifts of money or cash equivalents.
X	Link between gifts / giveaways and any sort of conditions or service in return (recipient may not be placed, or be perceived to be placed under an obligation towards the party offering or giving such gift/giveaway).
X	Tokens of any kind to political parties, representatives thereof, mandate holders.
X	Any suspicion that holders of public office should be influenced in any manner (even to act in accordance with their duties) or a generally supportive atmosphere should be created by way of a gift.

### IV. Issuing INVITATIONS IN THE PUBLIC SECTOR (→ public official involved!)

Subject to prior approval <sup>4</sup> of the superior & the following conditions are met	
!	Invitation to an ordinary business meal: Low value, nature and scope must be compliant with customary local business practice and with position of the recipient.
!	Invitation to a professional event with a broad group of invitees with a clear and objectively justified official interest of public official to participate.
!	Nature and scope must be compliant with customary local business practice.
!	Invitation is voluntary, not in anticipation of a return service/preferential treatment.
!	Ascertain that the public official is allowed to accept the invitation: public official should contact its competent compliance function.
!	Invitation may only apply to event as such, not to travel, hotel or fringe events.
!	Compulsory documentation.

Not permissible	
X	Invitations contradictory to the aforementioned guidelines; in particular, bilateral invitations and invitations with a small group of invitees must be avoided (unless such invitations demonstrably occur on a mutual basis or are clearly motivated by private reasons only – in any event, prior report to superior required!).
X	Link between invitation and any sort of conditions or service in return (recipient may not be placed, or be perceived to be placed under an obligation towards the party offering or giving such invitation).
X	Any suspicion that holders of public office should be influenced in any manner (even to act in accordance with their duties) or a generally supportive atmosphere should be created by way of invitations.

<sup>3</sup> For the definition of public officials, see section 1.A.iv. of these Guidelines.

<sup>4</sup> On an exceptional basis and only in the event of an invitation to a business meal where the circumstances do not allow for obtaining prior approval, such invitation must be reported to the superior immediately afterwards.

**Attachment 2:  
„Red Flag“-Assessment for charitable donations and sponsorships**

**OVERVIEW**

Audited Party (name/company name)	
PWL-company concerned	
Project	
Date	
Employee responsible	

Conclusion	Comment / Explanation
<input type="checkbox"/> Red Flag(s) identified <input type="checkbox"/> No Red Flag(s) identified	

**Information on the assessed Party**

Legal Form	
Registration number	

Address (registered office and business address)	
Contact person(s)	<ul style="list-style-type: none"> <li>• phone: e-mail:</li> <li>•</li> </ul>
Activity	
Company structure	
Management Board	

**Please tick the appropriate boxes:**

<b>1. Ease of access to information &amp; reports</b>	
<input type="checkbox"/>	<b>No proof of registration or real existence</b>
<input type="checkbox"/>	<b>Inability to access financial statements or failure to comply with financial obligations; e.g.</b> <ul style="list-style-type: none"> <li>• Failure to publish financial statements despite legal obligation to do so;</li> <li>• Auditor's refusal to approve the financial statements;</li> <li>• Suspicions, ongoing investigations or sanctions related to financial obligations (e.g. accounting fraud, tax evasion, insider trading, etc.)</li> </ul>
<input type="checkbox"/>	<b>Supervision and management bodies not identified</b>
<input type="checkbox"/>	<b>Shareholders and beneficial owners not identified</b>

<b>2. Governance</b>	
<input type="checkbox"/>	No governance policy
<input type="checkbox"/>	Non-compliance with governance standards and regulations
<input type="checkbox"/>	Other governance problems

<b>3. Prior legal proceedings, corruption and money laundering</b>	
--	--

<input type="checkbox"/>	<p><b>Issues related to corruption or money laundering, e.g.</b></p> <ul style="list-style-type: none"> <li>• Ongoing investigations or legal proceedings in cases of corruption, conflicts of interest, or money laundering (in the counterparty's country or internationally);</li> <li>• Cases of potential corruption that have not been followed up on because of a lack of judicial independence;</li> <li>• Strong suspicions (e.g. serious allegations made by an NGO or an investigation);</li> <li>• Practice repeated by the third party.</li> </ul>
<input type="checkbox"/>	<p><b>The shareholding or corporate structure includes tax havens,<sup>2</sup> trusts, or foundations<sup>3</sup>, e.g.</b></p> <ul style="list-style-type: none"> <li>• The shareholding structure is designed solely to hide who the real beneficial owners are, or for tax evasion or money laundering purposes;</li> <li>• anonymous trust: unknown settlor/beneficiaries;</li> <li>• Nested holding companies in tax havens (see footnote 5);</li> <li>• Serious accusations that offshore companies are used and that could cause reputational problems.</li> </ul>
<input type="checkbox"/>	<p><b>Politically Exposed Persons (PEP) or public entities are involved</b></p> <ul style="list-style-type: none"> <li>• PEP (or family member of a PEP) who can influence the award of a contract in the country where the donation/sponsorship will take place;</li> <li>• PEP who can cause problems in terms of illegally acquired assets/money laundering;</li> <li>• PEP who can cause serious reputational problems (e.g. family member of a dictator or of politicians known to be corrupt or involved in human rights violations).</li> </ul>
<input type="checkbox"/>	<p><b>The counterparty or its shareholders is on a sanctions/embargo list or exclusionary list</b></p> <ul style="list-style-type: none"> <li>• listed on the U.S., EU, or UN sanctions/embargo list in the country where the planned donation/sponsoring will be;</li> </ul>

<input type="checkbox"/>	<ul style="list-style-type: none"> <li>• Prohibition to submit bids in the country where the donation/sponsorship will be;</li> <li>• Prohibition by the regulatory authorities to engage in an activity (e.g. prohibition to offer the certain services).</li> </ul>
<input type="checkbox"/>	Activities in countries under embargo/on a sanctions list
<input type="checkbox"/>	Other violations of national and international standards

<b>4. Corporate Social Responsibility and Human Rights</b>	
<input type="checkbox"/>	No code of conduct or ethics and human rights policy
<input type="checkbox"/>	<b>Issues related to Human Rights</b>
<input type="checkbox"/>	<b>Issues related to the environment</b>
<input type="checkbox"/>	<b>Issues related to health/safety/security</b>

<sup>2</sup> See as indicator the respective list of the EU, status 27.02.2020, available in different languages under [https://eur-lex.europa.eu/legal-content/de/TXT/?uri=CELEX:52020XG0227\(01\)](https://eur-lex.europa.eu/legal-content/de/TXT/?uri=CELEX:52020XG0227(01)).

<sup>3</sup> Exception: family trusts or foundations or trust/foundations whose founder and beneficiaries are known.



Beneficiary/Recipient of Donation:	
Amount of the Donation:	

Description of the organisation including a link to the website:

One-time donation: Yes  No

Conflict of interests: Yes  No

Is the organisation a political organisation or party? Yes  No

Date, Name, Signature of Managing Director of the subsidiary:

Integrity confirmed\* : Yes  No

Conclusion Due Diligence\*:

Date, Name, Signature of Head of Corporate Communications:

Date, Name, Signature of the CEO, Powerlines Group:

Compliance Policy Powerlines Group: [https://www.powerlines-group.com/spl/powerlines.nsf/sysPages/compliance\\_de.html](https://www.powerlines-group.com/spl/powerlines.nsf/sysPages/compliance_de.html)

\* Check and confirmation by Head of Corporate Communications

**Attachment 4:  
Final Approval Form for Sponsorings**

POWERLINES may support, sponsor and contribute to social and community activities that are aligned with POWERLINES' business objectives and values. Such donations and social investment must not be made so as to create the perception of impropriety or unfair advantages in competition, in particular when dealing with public officials, politicians and others of influence.

Sponsoring means any contribution in cash, in kind or services for the benefit of an event or cause organized by a third party. In return for its contribution POWERLINES shall receive the right to publicly display its logo and to promote its brands and products, potentially also to participate as a speaker, to be mentioned in the inaugural address and/or to receive tickets for that event. Generally, sponsoring of political parties or purely political events shall be prohibited; exceptions may be permitted by Group Management Board.

Applicant / internal contact person:	
Date:	
Name of concerned subsidiary:	
Sponsored Party	<input type="checkbox"/> An Organisation <input type="checkbox"/> An Event <input type="checkbox"/> Others (→ Explanation):

Description of the organisation or event including a link to the website:

Amount of Sponsoring:

Duration of Sponsoring:

Is the reputation of the organisation/event known:      Yes       No

Conflicts of interests:      Yes       No

Is the organisation a political organisation  
or party? Is it a political event?      Yes       No

Are there any services in return:      Yes       No



If yes, please specify:

- Presentation of the company logo (website, event, print publications)
- Being mentioned as Sponsor
- Presentation of the company (Roll-Ups, Flyer, Folder)
- Event tickets
- Presentation/Speaker Slot
- Presentation of products or services
- Others

Is there a written agreement/sponsorship contract :      Yes       No

Date, Name, Signature of Managing Director of the subsidiary:

Integrity confirmed\*:      Yes       No   
 Conclusion Due Diligence\*:

Written agreement/contract concluded:      Yes       No

Date, Name, Signature of Head of Corporate Communications:

Date, Name, Signature of the CEO, Powerlines Group:

Compliance Policy Powerlines Group: [https://www.powerlines-group.com/spl/powerlines.nsf/sysPages/compliance\\_de.html](https://www.powerlines-group.com/spl/powerlines.nsf/sysPages/compliance_de.html)

\* Check and confirmation by Head of Corporate Communications