

Reminder of Gifts and Entertainment Policy for Business Partners

Dear Suppliers,

As part of our ongoing commitment to maintaining strong ethical standards and foster a fair and transparent procurement process, I would like to take this opportunity to remind everyone of our company's policy regarding gifts, hospitality and invitations to events when dealing with suppliers and business partners. International has also recently updated our Code of Conduct for Suppliers & Business Partners and is posted on our [supplier portal](#). Our policy regarding gifts, hospitality and invitations aligns with our requirements for business ethics in the Code of Conduct.

We recognize that the practice of many of our suppliers and business partners is to provide small gifts, to pay for meals or extend invitations to events for our employees. International employees may also provide gifts or entertainment to suppliers and business partners if certain conditions are met. In general, International employees must not accept or provide gifts, hospitality or invitations to events that could influence or appear to influence their business judgment and/or may reflect negatively upon our business relationship with you.

To summarize our policy:

1. Prohibited Items include, but are not limited to, cash (incl. gift cards), loans, extravagant items, vacation/social nature, adult entertainment, personal favors, and any form of bribes.
It is strictly prohibited to offer or accept a benefit in exchange for something. Benefits should never be aimed at bringing a specific decision or giving a reward for a decision. Benefits that are requested by a third party or the request of a benefit from a third party is not allowed.
2. Permissible Items: Modest and appropriate gifts or entertainment, if not granted/accepted repeatedly over a short period of time, are generally acceptable. However, it is important to always consider the potential impact on the perception of fairness, objectivity, and integrity in our relationships with suppliers and business partners.
3. Approval Process: At International, we have an approval process in place that we follow to seek prior approval according to the approval levels within our organization for any gifts or hospitality given or received. This helps ensure consistent decision-making and mitigate potential risks or conflicts of interest.
4. Record Keeping: All instances of accepted or granted gifts and entertainment are

documented accurately and transparently by the International employee.

It is the responsibility of everyone to uphold these guidelines. By doing so, we demonstrate our commitment to fostering trust with you and protecting the reputation and integrity of both our organizations.

If you have any questions or require further clarification, please do not hesitate to reach out to Corporate Compliance at ComplianceAdvice@International.com or (331) 332-2500.

Sincerely,

Peter Friberg
VP, Purchasing

David Juengel
VP, Chief Compliance Officer