

Questions & Answers

Invitations

As part of business relationship, I would like to invite third parties to lunch at a lavish restaurant.
Is this acceptable?

Yes. However any individual attending, that is not employed by TRIGANO requires prior approval from the invitee's manager/director. The invitation should not pertain to morally wrongful practices.
The subsidiary may set an expenses scale regarding invitations used for business relationships to prevent any overspending.
The receipt either on the front or back, should clearly state the names of the guests and their company's name(s).

Gifts for clients

I would like to give a gift valued of 500€ to my clients or prospects. Would this be compliant with the Group's ethical principles?
How can I determine the correct gift value or the frequency in which it can be gifted?

Yes, however the gift value should be reasonable.
These gifts should not be used for remuneration of decision-makers to secure a deal or the exclusivity of a network.
Furthermore, gifts must be handed over in an open and transparent way. They must be properly recorded and reported to the manager/director of the person who is gifting the gift.

Receiving gifts or invitations

A supplier wants to give me a gift or invitation (restaurant, sports event, theatre, concert, etc...). My spouse or friend would also benefit.
Can I accept?

During a factory visit in China, my supplier invites me to a renowned restaurants and offers me an expensive gift.
Declining it could be seen as rude and even damaging to the business relationship.
May I refuse to attend the reception?

Yes, but within strict limits. TRIGANO's employees shall under no circumstances seek to benefit from gifts or invitations. The gift should not be easily convertible into money (cash or goods easily saleable). The gifts or invitations value should not generate an income increase for the employee, even secondary, nor represent expenses he could not pay for or not in line with his incomes. Except express authorization from the General Management of TRIGANO, the acceptance of invitations which could benefit both the manager and or his partner/friend, not salaried by TRIGANO, is forbidden. When an employee receives a large quantity of gifts at the end of the year, sharing with colleagues is recommended, either directly or by the organization of a drawing of lots.

While receiving a gift, the employee must ask themselves:

- would the gift or invitation received be likely to affect their judgement or question their impartialness in future transactions?
- Is the frequency reasonable?
- would it be difficult to justify these gifts to their colleagues?

In countries where gifts or invitation exchange is part of cultural standards, it may sometimes be difficult to refuse such. The employee can then rely on the Group code of ethic to explain/justify their refusal and explain that accepting the gift would be a breach of the Group's ethical principles.

Conflicts of interest

My cousin runs an industrial maintenance company renowned for the quality of its services. As an industrial manager, can I do business with them, given the fact that their company presents the most competitive service offer?

Yes, it is possible to ask them to make a bid. However, the employee must not be involved in the decision-making process. This is to ensure that the decision is taken objectively. They also need to inform their immediate supervisor of the existing family link with this potential business partner.

Employment of relatives

I would like to hire my partner or a close one. Does TRIGANO authorize such hiring?

Yes. The employment of a partner or a relative of a TRIGANO employee is authorized. However, when considering hiring of operational staff of certain level (qualified employee or managerial staff), the following 4 conditions must be fulfilled:

- respond to a real need of the company (the hiring would have happened anyway),
- the hired person must be skilled and experienced for the position,
- the remuneration package must be in line with market standards,
- prior to the hiring, the involved employee must inform the manager of the business unit or the General Manager of TRIGANO, who will formulate a written reasoned opinion.

Remunerations of intermediaries

I recently won a new customer thanks to the relationship of a third-party. We verbally agreed an introduction fee based on the value of the contract. Is this compliant with Trigano's ethical principles?

No, introduction fees or commissions need to be agreed prior to the engagement of the business provider, even if that reduces the profitability of the contract. It is also imperative to formalize a written commission agreement prior to engagement.

When an executive manager must face such a situation, with no alternative, they must question:

- The lawfulness of this commission both from a legal and tax point of view in the country where the charge will be recognised by Trigano;
- The ultimate destination of the funds paid: does the recipient keep the fee, without any likelihood of retrocession to the decision-makers of the client organization?
- The compliance of the remuneration expressed as a percentage of the contract with the values of the market (at the level or below).

A contract defining what is agreed (expected services, basis for price calculations, terms and conditions, calculation of the commission) will be formalized with the help of the group legal department. The latest versions of the signed contracts will be kept in the subsidiary.