

Compliance



Gift and Entertainment Policy

GIFTS AND ENTERTAINMENTS

Our values and the rationale behind this Policy

The Gift and Entertainment Policy is part of the Anti-Corruption Program of OVHcloud and it is absolutely crucial to comply with local and global Anti-Corruption regulations. The Program is set up to strengthen our position as a trustworthy and reliable Partner.

OVHcloud stands for trust, passion and responsibility. Public perception is of paramount importance for the success of our company. The trusting cooperation with our Partners and the responsibility we take in our business relationships are fundamental to our reputation.

As employees, you are among the first to represent the values of OVHcloud. During your various operations, you may receive gifts or entertainments as a courtesy or as a token of thanks and trust. However, while offering a gift or entertainment is often a harmless act, it sometimes is the starting point of corruption and the desire to influence decision-making. Offering or receiving a gift is then prohibited!

Failure to comply with the rules in this Policy can have serious consequences for the company as a whole and for every employee involved. For the company there is a financial and reputational risk. For every employee failure to comply with this Policy may also have disciplinary consequences, lead to heavy fines or may even cause prison sentence as some actions in the field of corruption are considered serious crimes.

This is why we have implemented this policy to allow everyone to be vigilant when receiving or offering gifts or entertainments.

Target audience

This Policy applies to every single employee of OVHcloud worldwide.

If you are an employee of the OVHcloud US entity, please check your specific version of the Gift and Entertainment Policy.

Regardless of our company position or our geographical perimeter, we all have to follow this Policy.

4 GOLDEN RULES

The easiest way to decide how to proceed with a gift or entertainment is to follow the Golden Rules

1 I will always ask myself about the reasons behind the gift or entertainment.

- ▶ A gift shall never make the recipient feel indebted or affect the decision-making of the recipient.
- ▶ If the underlying motivation is anything other than recognition or courtesy, then I cannot offer or accept the gift or entertainment.

All sensitive functions at OVHcloud (buyer, governing body...) must very strictly follow this Policy as they are the ones most exposed to the risks.

2 I will never accept a gift mentioned as prohibited in the policy:

- ▶ Gifts in cash, in financial instruments, gift certificates.
- ▶ Financial advantages: prime lending, reductions, etc.
- ▶ Services or benefits in kind: employment, internship, domestic services.
- ▶ Gifts or entertainments for family and friends.
- ▶ Gifts or entertainments during critical periods: tender, negotiation, important decision.
- ▶ Gifts or entertainments from a public official.
- ▶ Gift not related to professional activity.
- ▶ Sumptuous gift: luxury products, gold, precious stones, works of art...
- ▶ Gifts offered repeatedly by the same person/entity.
- ▶ We refuse any gift / entertainment from public actors.
- ▶ A gift that by its very nature could cause reputational damage to OVHcloud or me.

If the gift or entertainment is not in this list, I will proceed to the next step.

3 If my gift is not mentioned as prohibited, I have to check very carefully its value:



- The gift is worth less than **20 euros**: it is authorized.
- The gift is worth between **20 and 150 euros**: i can accept or reject if I accepts it, I will declare it on [go/gift](https://ovhcloud.com/go/gift).
- The gift is worth more than **150 euros**: forbidden.

The prices mentioned above are applicable in most European countries. For further information on the thresholds applicable in your country please refer to the list of thresholds in foreign currency by country and currency adapted for each region : [Gift Price Matrix](#)

If the gift is authorized, I will proceed to the next step.

4

I will not accept frequent gifts from the same third party.

Reminder:

If local custom prevents me from refusing a gift or entertainment, I will accept it on behalf of the company and refer it to the Compliance department.

I would not endanger OVHcloud or myself by committing an act of corruption or an attempt.

Final conclusion

All OVHcloud employees have to follow this policy. Failure to comply may have serious consequences. For further questions or in doubt please refer to the compliance team.



[compliance\[@\]ovh.com](mailto:compliance[@]ovh.com)



Romain Beeckman

Chief Compliance Officer



[go/gift](#)

Gift declaration platform

