



Global Policy

Conflict of Interest

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1 Executive Summary

A conflict of interest is a situation which may happen to each and every employee. Envu is committed to an appropriate handling of arising conflicts of interest as set out in the [Compliance Management Policy # 1.09](#). All Envu employees are required to keep private and business relationships strictly apart and to disclose a conflict of interest situation as soon as it arises.

This Policy is intended to provide a clear overview of the handling of conflicts of interest, outlining examples and best practices. The objective is to support Envu employees to ensure that their activities are at all times fully compliant with applicable laws and our [Compliance Management Policy # 1.09](#).

2 Purpose Statement

2.1 Policy Rationale

Conflicts of Interest may arise in several contexts of our work with, on the one hand, the private interest of an employee and, on the other hand, the interest of the company. Such conflicts can affect actions and decisions. Even if no improper interference occurs, it might nevertheless appear to other employees or to third parties that there indeed is a conflict of interest leading to decisions to their detriment.

Therefore, personal relationships and private interests are to be kept separate from business.

Conflicts of interest may arise in various contexts, e.g. in case of personnel decisions, where the person who has to take a decision also has a private relationship with the employee concerned, or in cases where an employee manages the relationship with a third party although the employee also has a personal relationship with such third party.

If a conflict arises, the company's interest must take absolute priority and transparency is key: any conflict of interest has to be disclosed to the superior as soon as possible. In case of doubt, the decision should be objectified by consulting the superior or the Head of Legal & Compliance or relevant regional Lead Legal Counsel & Compliance Officer ("Compliance Partners").

Envu is committed to avoiding an inappropriate handling of arising conflicts of interest as set out in the Envu [Compliance Management Policy # 1.09](#).

2.2 Risks to be mitigated

Inappropriate handling of conflicts of interest can cause serious financial and reputational damages for Envu. To the extent legally permissible, based on the circumstances of the case, Envu fully reserves the right to claim back arising damages from employees as a result of culpable misconduct, in addition to other adequate measures available under applicable labor law, including but not limited to written warning, formal reprimand, and dismissal. And any non-compliance may impact the performance reviews of the employees.

2.3 Groups Affected

Envu employees are expected to familiarize themselves with the handling of conflicts of interest

set out in this Policy. They can raise with their superior or Compliance Partner any questions they may have as to the meaning or application of the principles set out herein.

In case of any conflict between the principles set out in this Policy and the laws, rules or regulations applicable in any country or region in which Envu employees do business, the following rules shall apply:

- If the laws, rules or regulations in any country or region impose standards or requirements stricter than those set out in this Policy, such stricter standards or requirements must be followed in addition to the principles set out in this Policy.
- If the laws, rules or regulations in any country or region are less strict than those set out in this Policy, the principles set out in this Policy must nevertheless be observed as they represent our values as expressed in our [Compliance Management Policy # 1.09](#). However, in case the laws, rules or regulations in any country or region prohibit the application of the requirements set out in this Policy, this shall of course be abided.
- In other cases of deviations between the principles set out herein and the laws, rules or regulations of any country or region, such laws, rules or regulations shall prevail.

3 Policy Content

3.1 Policy Statement

3.1.1 Guidance on Conflict of Interest

3.1.1.1 Basic concept

Situations where conflicts of interest exist are, especially in globally active companies with many employees, to a certain extent unavoidable. Therefore, awareness of the correct handling of such situations is of utmost importance and the central element to address such a situation is creating transparency at an early point.

Conflicts of interest must be disclosed to the superior as soon as possible. The superior will decide on how to solve the conflict of interest and which appropriate measures should be taken. In case of doubt, the superior will consult with the Compliance Partner and / or People Business Partner. The disclosure of the conflict of interest as well as any measures taken to solve it should be clearly documented.

The following sections will outline typical situations in which such conflicts can arise and illustrate their correct handling.

3.1.1.2 Personnel Decisions

One of the most important tasks of a manager is to take the right personnel decisions. These decisions (hiring new colleagues, promotions, bonus grants, task assignments, job rotations, but also sanctions, etc.) represent the way the leadership of our company is seen by the affected employees in their daily work life.

Therefore, it is of utmost importance that employees can rely on these decisions being made in an unbiased environment and in the best interest of the company. Otherwise such measures will not be accepted and cause confusion, tension and grievances among colleagues.

An Envu employee must not let any private interests (e.g., any family or business relationships with employees benefiting or suffering from a decision) interfere with the decision they take.

An example of such a situation is provided below:

Anna has recently been appointed head of a laboratory. The promotion also presents her with a challenge: for the past 18 months, she has been in a private relationship with Philip, who works in the laboratory she now manages. So far, they have not revealed their relationship to their colleagues.

Anna had considered disclosing their relationship to her supervisor. However, as she feared this could become a major discussion point among colleagues, she decided to keep their relationship confidential. Two months later, she finds out that the project her partner is in charge of is much more important for the company than was previously apparent. In recognition of his special achievements in this project, she recommends awarding an individual bonus of EUR 1000 to her partner.

In general, personal relationships are private matters. However, such private relationships at work can lead to a conflict of interest where there is, on the one hand, the private interest of a colleague (a harmonious partnership) and, on the other, the company's interest (neutrality of the decision-making) to consider. Such conflicts can ultimately lead to decisions being taken on the basis of inappropriate considerations. Even if a decision and its content are perfectly fine, it could nevertheless, on subsequent announcement of the relationship, appear as unfair preferential treatment.

In this specific case, Anna should have contacted her supervisor when she was appointed head of the laboratory in order to create transparency regarding the possible conflict of interest. This transparency would have enabled the supervisor to assess the situation and take measures to avoid the conflict of interest (e.g. by transferring Philip to another laboratory team).

<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Continuously ask yourself whether decisions you take are in the best interest of the company.	<input checked="" type="checkbox"/> Keep a conflict of interest situation secret.
<input checked="" type="checkbox"/> Check whether conflicts of interest with your private life exist which may, if made public, be seen as an improper influence on the basis of your decisions.	<input checked="" type="checkbox"/> Take decisions or enter into obligations for Envu in a conflict of interest situation without having reported the situation to your supervisor and without having received instructions on how to handle it.
<input checked="" type="checkbox"/> Report such detected situations to your supervisor and document such disclosure.	
<input checked="" type="checkbox"/> Consider to which extent such situations should also be communicated to other employees.	
<input checked="" type="checkbox"/> As supervisor, document the handling of a conflict of interest case which has been disclosed to you.	

3.1.1.3 Business Relationships with third parties

3.1.1.3.1 Personnel interest in third party

Business relationships with third parties must be formed on the basis of objective criteria (e.g., price, quality, reliability, technological standard, product suitability, existence of a long-standing and trouble-free business relationship).

The execution of a contract or continuation or termination of a business relationship with a third party must not be influenced by personal relationships, personal interests or tangible or intangible personal advantages.

Especially the supply of products or provision of services to Envu by companies that are controlled by Envu employees or their close relatives must therefore be subject to close scrutiny.

Decisions taken in situations where a non-disclosed conflict of interest exists (e.g., if the conclusion of an agreement benefits the decider or his or her family), will not only severely undermine the level of trust in the management capabilities of the respective decider, but also impact Envu's reputation in the market as other business partners may feel that an unfair decision to their detriment has been taken. This will be the case even in the absence of actual damage.

An example of such a situation is provided below:

Fred is responsible for the inspection of various measuring instruments and if necessary, he has to hire an external company to calibrate them. A friend and former colleague who started his own business a few years ago and now performs such work has offered to take on the job.

Fred values his ex-colleague's professional capabilities and he also maintains a private relationship with him. For example, their families often meet in summer to have barbecues and two years ago, they went on holiday together. Fred is a little uncomfortable with the idea of negotiating a deal related to Envu with a friend. But he considers the offer to be good because it is similar to the other two offers he has received. Additionally, he is also looking forward to having an uncomplicated working relationship. For these reasons he asks the procurement department to award the contract to his friend.

This is a classic conflict of interest, where on the one hand there is the private interest of a colleague (a good relationship with a valued friend) and on the other hand the interest of the company (best quality, but also best conditions for supply). Such conflicts can affect actions and decisions. Even if no improper interference occurs and even if the contract is in the best interest for the company from an objective perspective, it might nevertheless appear to concerned parties that there indeed is a conflict of interest to their detriment.

From the perspective of compliance, however, it is not required per se to terminate the business relationship in this specific case. It is possible that the friend indeed truly provides the best conditions.

The conflict of interest, however, has to be handled transparently (even if the colleague believes that he is completely aware of the pros and cons) and the decision has to be objectified. According to the general rules of conduct, he would thus have to disclose the conflict of interest to his supervisor. The decision on awarding the contract and the objective review of the conditions would then be taken by the supervisor directly or delegated to a colleague.

<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Continuously ask yourself whether decisions you take are in the best interest of the company.	<input checked="" type="checkbox"/> Keep a conflict of interest situation secret.
<input checked="" type="checkbox"/> Check whether conflicts of interest with your private life exist which may, if made public, be seen as an improper influence on the basis of your decisions.	<input checked="" type="checkbox"/> Take decisions or enter into obligations for Envu in a conflict of interest situation without having reported the situation to your supervisor and without having received instructions how to handle it.
<input checked="" type="checkbox"/> Report such detected situations to your supervisor; document this report.	
<input checked="" type="checkbox"/> Consider to which extent such situations should also be communicated to other employees.	
<input checked="" type="checkbox"/> As supervisor, document how you handled a conflict of interest situation which has been reported to you.	

3.1.1.3.2 Contracting of Envu business partners for personnel purposes

A conflict of interest can arise when an employee wishes to contract for personal purposes a person or entity that has an existing business relationship with Envu, e.g. a supplier or service provider, and that employee is in a position to directly or indirectly influence Envu's business relationship with the business partner in question. In this situation the employee must notify their supervisor in advance. The supervisor then needs to decide how to handle the employee's responsibilities towards the business partner.

In case such a conflict is not handled transparently a situation may arise in which the conduct of the involved persons in Envu's business relationship may be affected by the implementation of the private business partnership. This may hinder an open communication on elements to be discussed in Envu's business relationship and in the worst case may cause damages to our company.

As a general rule, however, Envu employees who are not, directly or indirectly, in the position to influence the conditions or the performance of a business relationship may contract Envu's business partners for personal purposes on the basis of normal market conditions. This can be the case, e.g., for contracting Envu's service providers for moving households.

An example of such a conflict of interest situation is provided below:

For two and a half years, Ian has been working as the Head of Administration of a Envu site. This site also features garden areas and only recently he has approved the contract with a new one-person lawn care company for the site for a year. "The site always looks beautiful and everybody with whom I have spoken tells me that the gardener is doing a very good job. As he also works for Envu, I believe he would be a very trustworthy person and since the service fees are relatively low, he might be interested in increasing his company's revenues."

Three days later he asks the gardener whether he would be interested if his company also took care of his private garden for four hours every Saturday. He offers to pay an appropriate amount of service fees. The gardener happily accepts this offer. Ian considered revealing his

plans to his supervisor as he knows that in the near future he will be the one to decide whether the contract with the lawn care company is prolonged or not.

But he came to the conclusion that what external contractors do when they do not work for Envu is of no interest to the company.

When a colleague who can influence the contract with a service provider contracts such service provider for personal purposes this can lead to a conflict of interest where there is, on the one hand, the private interest of the colleague (having a trustworthy lawn care company for his private purposes) and, on the other hand, the company's interest (neutrality of the decision making). Such conflicts can ultimately lead to making decisions based upon inappropriate considerations. Even if a decision and its content is perfectly fine, it could nevertheless, when this employment is subsequently revealed, appear as an unfair or preferential treatment.

To avoid misunderstandings in case of conflicts of interest such a decision must therefore be objectified and has to be taken either with the help of the supervisor or with the help of the Compliance Partner.

In this specific case, Ian should have first contacted his supervisor or his Compliance Partner in order to create transparency concerning his possible conflict of interest in the future decision whether or not to prolong the contract with the gardener.

<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Continuously ask yourself whether decisions you take are in the best interest of the company. <input checked="" type="checkbox"/> Check whether conflicts of interest with your private life exist which may, if made public, be seen as an improper influence on the basis of your decisions. <input checked="" type="checkbox"/> Report such detected situations to your supervisor; document this report. <input checked="" type="checkbox"/> As supervisor, document how you handled a conflict of interest situation which has been reported to you. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Keep a conflict of interest situation secret. <input checked="" type="checkbox"/> Enter into a contract with a Envu business partner for personal purposes, if you are in a position to influence, directly or indirectly, Envu's relationship with such business partner, without prior approval of your superior.

3.1.1.4 Use of services of Envu employees for personnel purposes

Supervisors and managers may not abuse their authority by availing themselves of the services of Envu employees for personal purposes.

An employee who is asked by a member of upper management for services for personal purposes is usually not in a position to freely decide about whether or not to perform these services because they could fear that in case of a refusal such upper manager could obstruct their further career (e.g., if, in the example under section 3.1.1.3.2, the gardener was an Envu employee). Also, in case the employee has a fulltime contract, he or she is generally obliged to fully dedicate his or her energy to working for Envu, so that work outside the Envu employment could prevent him or her from performing his or her duties for Envu.

There may be cases where services for personal purposes by Envu employees do not pose a conflict of interest, such as when the employees can freely decide whether or not to perform the services, when they are appropriately compensated and when the scope is such that these services do not interfere with the performance of duties for Envu.

The country organizations are asked to develop their own standards according to which Envu employees may perform services for personal purposes for other Envu employees by taking into account local labor law and the terms of the employment agreements.

<i>DO</i>	<i>DON'T</i>
<p><input checked="" type="checkbox"/> If you wish to ask a Envu employee for his or her services for personal purposes, ask yourself whether you are in a position to directly or indirectly influence personnel decisions concerning this employee or whether you otherwise have a position of authority towards such employee.</p> <p><input checked="" type="checkbox"/> If you are unsure about whether you may ask a Envu employee for his or her services for personal purposes, notify your Compliance Partner or the Human Resources department and verify whether any approval or further action is required; document such notification.</p> <p><input checked="" type="checkbox"/> When you do enter into a contract with another Envu employee for personal services be sure that the following conditions are fulfilled:</p> <ul style="list-style-type: none"> - the employee can freely decide whether or not to perform the services, - the services are appropriately compensated and - the scope is such that these services do not interfere with the performance of duties for Envu. 	<p><input type="checkbox"/> Ask a Envu employee, towards whom you have a supervisor position or otherwise a position of authority, for his or her services for your personal purposes without having notified and verified the situation with your Compliance Partner or Human Resources department.</p> <p><input type="checkbox"/> Ask or expect a Envu employee to perform services for your personal benefit unless the requirements of the “Do’s” are met.</p>

3.1.1.5 Inappropriate use of Envu property for personnel purposes

Employees shall not use items belonging to Envu (e.g., equipment, goods, vehicles, office supplies, documents, files, and data storage media) for their own personal purposes or remove such items from company premises without their authorized line manager’s explicit consent. Likewise, no data, programs or company papers may be copied or removed from the company’s premises without approval. Such use without approval can, under certain circumstances, even be seen as a criminal act.

Furthermore, Envu provides internet access and electronic communications for business purposes. The occasional use of the business internet connection for private purposes is

permitted. This permission may be revoked at any time. Use of the email system provided by Envu is for business purposes only. Electronic communication systems provided by Envu must be primarily used for business purposes.

Moreover, authorizations such as company credit cards, parking authorizations, partner cards for petrol stations, access cards to buildings and sites, etc. must only be used for the purpose they were granted for and must not be transferred to other colleagues or third parties.

The country organizations are asked to develop further rules regarding conditions under which the use of company property for personal purposes is permitted, to the extent they deem it necessary or useful.

An example of such a situation is provided below:

Alison is a researcher working in Clayton laboratory. She has decided to enroll in a Ph.D. program which can be taken as an evening class, spread over five years. Before she started the program she notified her boss and the Human Resources department about her plans, and they both supported her in her plans. For her final thesis she needs to analyze some substances via gas chromatography. Her university has a gas-phase chromatograph, but it is outdated, and in addition it is cumbersome to organize a time slot during which Alison can use the machine. It is easier to use the new gas-phase chromatograph in her own lab.

Alison needs to ask her line manager, authorized by the local regulation to approve the private use of the department's assets, whether she may use the Envu gas-phase chromatograph, of course outside her normal working hours and without interfering with the use of the machine by her colleagues. If her authorized line manager gives her permission, she can go ahead and use the gas-phase chromatograph.

<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Obtain the permission of your authorized line manager before you use Envu's property for private purposes (unless this specific use is already approved via an applicable internal regulation); document such permission.	<input type="checkbox"/> Assume nobody cares anyway if the intended private use is only of low value. The rules apply here as well.

3.1.1.6 Outside employment / starting one's own business without disclosure

Any employee intending to accept employment with an outside company – even on a freelance basis – or to set up their own business must inform their supervisor. This applies particularly to positions with companies that already do business or compete with Envu or might reasonably do so.

The supervisor will contact the Human Resources department which in turn will initiate a process to verify – according to local labor law and the terms of the employment agreement – whether the employer's approval is necessary and, if this is the case, to decide whether such an approval should be given.

<i>DO</i>	<i>DON'T</i>
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<input checked="" type="checkbox"/> Inform your supervisor if you intend to accept employment with an outside company.	<input type="checkbox"/> Accept employment with an outside company without informing your employer.
<input checked="" type="checkbox"/> Inform your supervisor if you intend to work for an outside company on a freelance basis.	<input type="checkbox"/> Start to work as a freelancer for an outside company without informing your employer.
<input checked="" type="checkbox"/> Inform your supervisor if you intend to setup your own business.	<input type="checkbox"/> Set up your own business without informing your employer.
<input checked="" type="checkbox"/> Document such information to your supervisor.	

3.1.1.7 Gifts / incentives from business partners / passive bribery

Conflicts of interest may also be triggered by the acceptance of improper benefits from suppliers, customers or other business partners. This may in turn give the impression that any decision you make concerning this business partner is based on receiving such benefits rather than on serving the interests of the company.

Envu employees must not, under any circumstances, demand personal benefits, such as money, gifts, services or anything else of monetary or non-monetary value.

In dealings with business partners, employees must avoid accepting any gifts in connection with the negotiation, award or performance of a contract. Any unsolicited gift can only be accepted if considered socially adequate under the circumstances, in accordance with applicable laws and in line with the established local value thresholds documented in the regional [Handling of Gift Policies](#) (see also [Anti-Corruption Policy # 1.12](#)). In case declining the hand-over of the gift is not possible for cultural reasons or if the value of the gift is not detectable at the moment of reception employees may accept the gift, but then directly inform the supervisor to decide on the further handling. If the value threshold has been exceeded, the gift must be returned, unless a return would not be acceptable for social or cultural reasons. In such a case the supervisor needs to decide – if needed with the help of the Compliance Partner – how to handle the gift, e.g., transfer it into company property or give it to a charity. Country organizations which have not yet issued a specific gift policy which clearly outlines which gifts can be accepted should develop clear guidelines.

In case of doubt, please contact your Compliance Partner.

An example of such a situation is provided below:

Pierre is responsible for the procurement of technical services. On a trade fair, one of the suppliers Pierre frequently orders from has put up a box for persons interested in receiving product brochures into which Pierre drops his business card. Four weeks later he receives a package containing an iPad. The accompanying letter informs him that there was a lottery for the persons who had left their business cards and that he has won the main prize. Pierre contacts his Compliance Partner.

The Compliance Partner informs Pierre that he should return the iPad because it is not within the value thresholds established by the company regulation. In cases where it is clear to the Envu employee that the supplier is holding a lottery (which it was not in this case) as a practical matter, it would be best if the employee does not participate in the lottery.

<i>DO</i>	<i>DON'T</i>
<p>✓ Ensure you are aware of applicable regional Handling of Gift policies and the values of gifts which are allowed therein.</p> <p>✓ Try to avoid accepting any gifts in excess thereof. In case this is not possible for cultural reasons you may accept the gift, but then directly inform your supervisor to decide on the further handling. Document such information to your supervisor.</p> <p>✓ As supervisor, document your decision on the further handling of the gift.</p>	<p>✗ Demand personal or business-related gifts under any circumstances.</p> <p>✗ Participate in lotteries organized by business partners of Envu if you are in a position to influence, directly or indirectly, Envu's relationship with such business partner.</p>

3.1.1.8 Fraudulent actions

A situation of conflict of interest also arises in cases where an employee does not correctly report his travel and entertainment expenses or other cost incurred during the exercise of his or her professional duty. This is the case if he or she or third persons obtain a personal gain from the reimbursement. If this is done intentionally, it can be seen as (an attempt of) fraud by the employee against the company, which can be prosecuted as a criminal act.

An example of such a situation is provided below:

On his business trip to Pittsburgh, Peter meets with two of his old university room mates who, accidentally, also work for Envu, but in different departments. They have a lavish dinner and celebrate the old times. Peter wants to be generous and pays the bill. Upon returning home he gets worried about the expensive dinner which made a deep cut into his finances. To improve his financial situation he files an expense report and claims that he discussed a research project during the dinner.

The dinner was not a business dinner, even if all participants work for Envu. Consequently, Peter is not entitled to a reimbursement of his expenses. Applying for reimbursement of such expenses by falsely claiming that a private dinner was a business dinner is even a fraudulent act which in many jurisdictions can be sanctioned with criminal penalties.

<i>DO</i>	<i>DON'T</i>
<p>✓ Carefully check whether claims for reimbursement are correct and in line with applicable Envu regulations, e.g. the Travel, Expense & Corporate Credit Card Policy # 2.08.</p>	<p>✗ Submit claims for reimbursements outlining a false background.</p> <p>✗ Circumvent applicable processes for reimbursements.</p>

As set forth in our [Envu Anti-fraud Policy # 1.15](#), any fraudulent behavior will be investigated and, depending on the facts and seriousness of the case, the actions against the concerned employee can range, in accordance with applicable laws, from written notification and a probationary period, up to and including dismissal, and / or legal action.

3.1.2 Implementation and Control - Functional processes

3.1.2.1 Introduction

Functional processes are measures to ensure that perceived and actual conflicts of interest are disclosed and that potential conflict of interest situations do not materialize. The processes are designed to easily fit into the existing business activities, thereby securing compliance with a minimum disruption to business operations.

Envu evaluates and improves the effectiveness of its conflict of interest management program in light of the current global and local business and legal environment. Risks and functional processes to mitigate such risks are identified and implemented as part of the Integrated Compliance Monitoring (ICM) process.

Section 3.1.2.2 summarizes those functional processes which each country is required to implement in alignment with local People Business Partners and Compliance Partners.

3.1.2.2 Processes

3.1.2.2.1 Disclosure

To the extent legally allowed, ensure regular discussion of potential conflict of interest situations with employees, including subsequent disclosure and documentation of any such conflicts of interest.

3.1.2.2.2 Involvement of upper management in important business decisions

Ensure involvement of upper management (four-eyes principle) in important local business decisions, including traceable and comprehensible justification for business decisions and investments.

3.1.2.2.3 Use of services of Envu employees for personal purposes

Enhance awareness for critical cases and define approval process for such critical cases of use of services of Envu employees for personal purposes.

3.1.2.2.4 Personal use of Envu property by Envu employees

Enhance awareness for company property (tangible and intangible assets) which employees typically use during their ordinary work and define approval process for uses of company property for personal purposes which are not already permitted under an existing Envu regulation.

3.1.2.2.5 Outside employment / employees starting own business

Introduce a process to ensure that employees are – in regular intervals – informed about and alerted to the rules regarding outside employment (also on a freelance basis) or the start of their own business.

3.1.2.2.6 Gifts to Envu employees

Respect the functional processes applicable to the country to ensure that employees are – in regular intervals – informed about and alerted to the rules regarding acceptance of advantages and gifts. Check our [regional Handling of Gift policies](#) for more information.

3.2 Roles and Responsibilities

Envu employees are accountable for their compliant behavior as regards conflicts of interest.

Envu managers are accountable to ensure that their team(s) know(s) and follow(s) the principles of this Policy.

Supervisors, Compliance Partners and People Business Partners advise Envu employees on any question arising from this Policy and make any decisions and take any actions necessary to its implementation.

3.3 Training

Training is a fundamental part of compliance at Envu. It increases awareness of high-risk situations and provides practical advice to Envu employees on how to avoid compliance infringements in daily business situations while supporting operational excellence.

Virtually all Envu employees could potentially be affected by a conflict of interest. For this reason, there is no need to further distinguish between different target groups at a global level. As a result, a comprehensive basic training has been developed.

Local organizations are however free to provide more in-depth training to employee groups specifically exposed because of the nature of their activities (e.g. procurement employees in the case of passive bribery) depending on local risk assessment.

Envu's conflict of interest training process is designed to ensure that guidance is provided in a consistent and systematic way to relevant Envu employees.

This training will help Envu employees to understand what a conflict of interest is. Further, it will support them in applying the legal requirements established in this Policy in their daily activities in order to avoid situations where a conflict of interest could arise.

For this purpose, employees will be trained on the following specific topics:

- General introduction on what constitutes a conflict of interest
- Guidance on different categories of conflict of interest with tailored examples relevant for Envu employees (covering the various scenarios developed above between the sections 3.1.1.2 and 3.1.1.8 of this Policy)
- Guidance on how to mitigate that risk in practice.

4 References

[Anti-Corruption Policy # 1.12](#)

[Anti-fraud Policy # 1.15](#)

[Compliance Management Policy # 1.09](#)

[Handling of Gift Policies](#)

[Travel, Expense & Corporate Credit Card Policy # 2.08](#)